

Chapter 5

CONSULTATION AND COORDINATION

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INTRODUCTION

The *Lower Gila South Resource Management Plan/Environmental Impact Statement* (RMP/EIS) was prepared by an interdisciplinary team of resource specialists from the Lower Gila Resource Area, Phoenix District, and Arizona State Office. Writing of the RMP/EIS began in September 1983, following a complex process that began in 1978. This process included wilderness and rangeland inventories, public participation, interagency coordination, and preparation of the management situation analysis (on file in the Phoenix District Office). Consultation and coordination with agencies, organizations, and individuals occurred in a variety of ways throughout the planning process.

SCOPING AND PUBLIC PARTICIPATION

The Phoenix District Office and the Lower Gila Resource Area Office invited public participation throughout the development of this RMP/EIS. The following list summarizes the actions taken.

1978-1979	Initial wilderness inventory and public comment period.
1979-1980	Intensive wilderness inventory and public comment period.
November 1980	Mailout and news release to inform the public and invite public participation in the planning process.
November 1980	Notice of Intent to Prepare the Lower Gila South Resource Management Plan published in the <i>Federal Register</i> .
December 1980	Issue identification mailout to interested parties.
December 1980	Special issue identification mailout to five Indian tribes in area.
January 1981	District Multiple-Use Advisory Council briefing.
January 1981	Public scoping meetings conducted in Ajo, Gila Bend, Quartzsite, Buckeye, and Phoenix.

March 1981	Public meeting summaries mailed to meeting attendees.
March and April 1981	Local, state, and federal government officials contacted individually for their contribution to issue identification.
April 1981	District Multiple-Use Advisory Council briefing on status of issue development.
April 1983	Scoping material mailed to concerned individuals and agencies.
May 24 to 26, 1983	Public meetings held in Gila Bend, Phoenix, and Tucson.
June 10, 1983	Notice of Intent to Prepare an EIS for the Lower Gila South Planning Area published in the <i>Federal Register</i> .
June 15, 1983	Letters sent to Indian tribal leaders.
February 1, 1985	Draft made available to public
March 11 to 14, 1985	Public meetings in Quartzsite and Ajo, Arizona
March 12 to 13, 1985	Public hearings in Phoenix and Gila Bend, Arizona
May 2, 1985	Public comments ended.

In addition, BLM specialists met many times in the field and at other locations with interested parties. BLM representatives consulted with the Soil Conservation Service, Arizona State Land Department, and Arizona Game and Fish Department to check resource data, coordinate methodologies, and exchange information.

LIST OF AGENCIES, ORGANIZATIONS, AND PERSONS TO WHOM COPIES OF THIS STATEMENT HAVE BEEN SENT

BLM will request comments on the draft EIS from all affected grazing permittees, interested individuals, federal and state agencies, and interest groups. Due to the size of the mailing list (800), the following is a partial list of those receiving the document.

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Federal Agencies

Advisory Council on Historic Preservation
Environmental Protection Agency
Department of Agriculture
 Forest Service
 Soil Conservation Service
Department of Defense
 Army Corps of Engineers
 U.S. Air Force
Department of Energy
Department of the Interior
 Bureau of Mines
 Bureau of Indian Affairs
 Bureau of Reclamation
 Fish and Wildlife Service
 Geological Survey
 National Park Service
Department of Transportation
 Federal Aviation Administration

Arizona State Agencies

Arizona Commission of Agriculture and Horticulture
Arizona Department of Health Services
Arizona Department of Library, Archives, and Public Records
Arizona Department of Transportation
Arizona Game and Fish Department
Arizona Natural Heritage Program
Arizona Office of Economic Planning and Development
Arizona Oil and Gas Commission
Arizona Outdoor Recreation Coordinating Commission
Arizona State Clearinghouse
Arizona State Historic Preservation Officer
Arizona State Land Commissioner
Arizona State Parks Board
Arizona Water Resources Department
Bureau of Geology and Mineral Technology
Governor of Arizona
Governor's Commission on Arizona Environment
Mineral Resource Department

Local Agencies

Central Arizona Association of Governments
City of Buckeye
City of Gila Bend
City of Phoenix
City of Tucson
District IV Council of Governments
District V Council of Governments
La Paz County Board of Supervisors
La Paz County Planning and Zoning Department
Maricopa Council of Governments
Maricopa County Board of Supervisors

Maricopa County Planning and Zoning Commission
Pima Association of Governments
Pima County Board of Supervisors
Pima County Planning and Zoning Department
Pinal County Board of Supervisors
Pinal County Planning and Zoning Department
Yuma County Board of Supervisors
Yuma County Planning and Zoning Department

Indian Tribes and Councils

Fort Mojave Tribal Council
Chemehuevi Tribal Council
Quechan Tribal Council
Cocopah Tribal Council
Colorado River Indian Tribes
Havasupai Tribal Council
Hualapai Tribal Council
Tonto Apache Indian Tribal Council
Yavapai-Apache Community Council
Yavapai-Prescott Board of Directors
White Mountain Apache Tribal Council
Hopi Tribal Council
Kaibab Band of Paiute Indians
Papago Council
Fort McDowell Mohave-Apache Community Council
Pascua Yaqui Tribal Council
Ak-Chin Indian Community
Gila River Indian Community
Salt River Pima-Maricopa Community Council
San Carlos Apache Tribal Council
Navajo Tribal Council

Other Organizations

Arizona Cattle Growers Association
Arizona Desert Bighorn Sheep Society
Arizona Mining Association
Arizona Mining and Prospecting Association
Arizona Prospectors and Small Mine Operators Association
Arizona Wildlife Federation
Arizona Wool Growers Association
Arizona 4-Wheel Drive Association
Audubon Society
Defenders of Wildlife
Desert Tortoise Council
League of Women Voters
Legal Organizations
Mining Companies
Phoenix District Advisory Council
National Audubon Society
National Council of Public Land Users
Natural Resources Defense Council, Inc.
News Media

LIST OF PREPARERS

Oil and Gas Companies
ORV Clubs
Phoenix-Lower Gila Resource Areas Grazing Advisory Board
Public Lands Council
Rockhound Clubs
Sierra Club (Local and National)
The Wilderness Society
Utility Companies
Wild Burro Protection Association
Wildlife Society

Elected Representatives

Federal

Senator Dennis DeConcini
Senator Barry Goldwater
Representative John McCain
Representative Jim McNulty
Representative Eldon Rudd
Representative Bob Stump
Representative Morris K. Udall

State

Senator Jones Osborn
Senator Polly Getzwiller
Senator Peter Rios
Senator S.H. "Hal" Runyon
Representative Bob Denny
Representative Henry Evans
Representative Jim Hartdegen
Representative Roy Hudson
Representative Frank McElhaney
Representative Robert McLendon
Representative Richard Pacheco
Representative James Ratliff

LIST OF PREPARERS

William (Bill) Carter, Team Leader*

BS in Agronomy, Kansas State University. Bill wrote Chapter 5 of this RMP/EIS and served as Technical Coordinator. He has worked 19 years for BLM.

Hector Abrego, Assistant Team Leader, Range Conservationist*

B.S. Range Science, Texas A&M University. Hector was responsible for the overall coordination of the RMP/EIS. He wrote Chapters 1 and 2 and the Range, Protected Plant, and Burro sections of the RMP/EIS. He also wrote the Range sections of the Wilderness Supplement. He has worked for BLM for seven years.

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Karen Daniels, Editorial Assistant

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Doris Coldwell, Division Secretary

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Tom Craft, Soil Scientist*

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Gary Foreman, Realty Specialist.*

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Mark Fredlake, Wildlife Biologist*

BS in Wildlife Management, Arizona State University. Mark has worked for BLM for seven years and wrote the Wildlife sections for the RMP/EIS and the Wilderness Supplement.

Richard Hanson, Wilderness Specialist*

BS in Parks and Recreation, Michigan State University. Rich was responsible for all Wilderness sections in the RMP/EIS. He also wrote Chapters 1 and 2 and the Wilderness sections of the Wilderness Supplement. He has worked six years for BLM.

Wanda Johnson, Word Processor Operator*

AA in Business Administration, Big Bend Community College, WA. Wanda provided word processing and technical assistance on both documents. She has worked one year for BLM.

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Dan McGlothlin, Hydrologist

BS Watershed Hydrology, University of Arizona. Dan has worked for BLM for four years and wrote the Water Resources sections of the RMP/EIS.

Fran Miller, Archaeologist*

BA in Anthropology, Wright State University; MA in Anthropology, Arizona State University. Fran wrote the Cultural Resources sections for the RMP/EIS and the Wilderness Supplement. She has worked for BLM for 1-1/2 years.

Hank Molz, Surface Protection Specialist*

BS Forestry, Northern Arizona University. Hank wrote all Recreation and Visual Resource sections of the RMP/EIS and the Wilderness Supplement and coordinated the writing for the Wilderness Supplement. He has worked 14 years for BLM.

Richard Parks, Geologist*

BS in Geology, Whittier College, UCLA, EIT Harvard University, Stanford. Richard wrote the Mineral and Energy Resources sections of the RMP/EIS and the Wilderness Supplement. He has worked for BLM for four years.

Jeanette Pranzo, ASO Social Analyst

BA Economics, Hunter College; MA Economics, University of Pittsburgh. Jeanette wrote the Social Elements sections of the RMP/EIS and the Economics and Social Elements sections of the Wilderness Supplement. She has worked for BLM for eight years.

Mark E. Van Der Puy, Hydrologist*

BS, Calvin College; BSF, University of Michigan; MS,

Watershed Management, University of Arizona. Responded to comments on draft RMP/EIS. He has worked six years for BLM.

* Responded to comments on draft and helped prepare final RMP/EIS.

ASO and PDO ASSISTANCE

The following people from the Arizona State Office provided technical assistance and review for this RMP/EIS and Wilderness Supplement.

Stan Wagner, Environmental Coordinator

Keith Pearson, Planning Coordinator

Bob Abbey, Wilderness Specialist

Bob Archibald, Realty Specialist

Ray Brady, DSD Mineral Resources

John Castellano, Wildlife Biologist

George Ramey, Range Conservationist

Darlene Wishart, Office Automation Specialist

The following people from the Phoenix District provided technical assistance and review for this RMP/EIS and Wilderness Supplement Supplement.

Marlyn Jones, District Manager

Bill Childress, Area Manager

Mary Barger, Archaeologist

Ted Cordery, Wildlife Biologist

Frank Daniels, Realty Specialist

Lee Higgins, Range Conservationist

Bob Mitchell, Range Conservationist

Review Process

The draft RMP/EIS was filed with the Environmental Protection Agency and their notice of receipt was published in the Federal Register on February 1, 1985. The 90 day comment period began February 1, 1985 and extended through May 2, 1985. The Bureau of Land Management's notice of availability and announcement of public hearings and meetings were published in the Federal Register on February 4, 1985.

More than 1,200 copies of the draft RMP/EIS were distributed to federal, state and local government agencies, organizations and individuals for review and comment. News releases from Washington and Phoenix provided information about obtaining copies of the draft RMP/EIS.

The Bureau of Land Management (BLM) held public hearings to receive oral testimony from the interested public on the draft RMP/EIS in Phoenix and Gila Bend, Arizona on March 12 and 13, 1985, respectively. Nine people spoke at Phoenix and five spoke at Gila Bend. Public meetings were held in Quartzsite and Ajo, Arizona on March 11 and 14, 1985, respectively. Approximately 300 individuals attended both the 3:00 p.m. and the 7:00 p.m. meetings at Quartzsite. The 3:00 p.m. meeting was a question and answer session and at the 7:00 p.m. meeting about 50 individuals spoke, but only 25 registered. The theme of most of the speakers at the Quartzsite meeting was that

they didn't want wilderness or any more restrictions placed on the public or state lands in the Quartzsite area. The Ajo meetings were also held at 3:00 p.m. and 7:00 p.m. There were no speakers at either meeting. The individuals who spoke with the Bureau representatives at the Ajo meetings voiced no problems with the draft RMP/EIS.

The Gila Bend hearing was recorded by an official court reporter. A GSA contract court reporter was hired for the Phoenix hearing, but did not show to record the hearing. The hearing was recorded on a small recorder and transcribed by a district secretary. The recorded tape and written copies of the speakers' testimony were used to prepare the transcript published in this document.

The RMP/EIS team and management reviewed all comments and responded to those questioning the analysis or raising issues related to the environmental impacts of the Proposed Action and alternatives. All comments, however, will be considered by BLM managers in making the decisions for future management of the Lower Gila South Planning Area.

Three hundred and one written comments were received on the draft RMP/EIS during the public comment period. A number of comments were received too late to be published in the final RMP/EIS but will be considered in the decisions for future management of the Lower Gila South Planning Area.

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LOWER GILA SOUTH PUBLIC HEARING

OPENING STATEMENT

MR. McHENRY: Ladies and gentlemen, this public hearing will now come to order. My name is Lawrence McHenry, I am an attorney in the Solicitor's Office, Department of the Interior.

I have been appointed by the State Director, Bureau of Land Management, to conduct this public hearing, under the authority of the Secretary of the Interior regarding the Resource Management Plan for the Lower Gila South Area for the Bureau's Phoenix District.

Most of you undoubtedly signed the attendance sheet as you came into the hearing room. If you have not done so, I would ask that you sign in now. If you plan to make a statement, be sure to check the appropriate space on the attendance card so we can add your name to the list of speakers.

Representatives from the Lower Gila South Resource Area here tonight are:

Bill Childress	-Area Manager
Richard Hansen	-Wilderness Coordinator
Bill Carter	-Team Leader
Tim Sanders	-Assistant Team Leader

This public hearing is being held to obtain testimony and information relating to the

that are being studied by the Bureau of Land Management in the Lower Gila South Resource Area Management Plan. A draft environmental impact statement EIS has been published and is available here tonight for those of you who have not already received a copy.

The Lower Gila South RMP/EIS is based on information from public workshops, rangeland and wilderness inventory records, and other sources, including federal, state, and local agencies, private organizations, and interested individuals. The purpose of the RMP/EIS is to disclose in advance the probable environmental impacts of the Proposed Action and its Alternatives, and to insure that these factors are considered along with economic and other considerations in the decision making process.

In arranging for this public hearing, notices were sent to United States Senators Goldwater and DeConcini, U.S. Representatives Stump and Udall as well as Governor Babbitt and other elected officials.

Notices have also been mailed to federal, state, and local government agencies and to organizations and individuals known to be interested in this planning effort.

A few words regarding procedure. This hearing is not a debate, a trial, or a question and answer situation. It is an ADVISORY hearing, and all interested persons may present statements--either written or oral or both--or other information pertinent to the Resource Management Plan.

There will be no cross-examination from the audience, but if anyone fails to understand a statement of any speaker, you may direct a clarifying question to me, I will make a determination whether it is pertinent.

I will call on Bill Childress, Area Resource Manager, to explain the proposed plan and findings in the draft environmental impact statement. Then I will call on the speakers in the order they registered to speak.

Bill Childress, Lower Gila South Resource Manager will now explain the BLM's proposed plan.

BILL CHILDRESS: First I would like to summarize the Quartzsite, Arizona Meeting held March 11, 1985, regarding our Draft Lower Gila South Resource Management Plan (RMP) and Environmental Impact Statement (EIS). The meeting was broken into two (2) sessions.

The first session started at 3:00 PM which constituted a brief opening statement, we invited the group to look at and discuss with the BLM personnel our draft document. Approximately 300 people attended this session which lasted approximately till 5:30 PM.

The second session started at 7:00 PM in which we allowed individuals to make comments/statements regarding our draft document in an open forum. We encouraged those who wished to speak to sign the Visitor Roster. Of the 50 people who spoke only 24 signed the Visitor Roster (Exhibit A). Approximately 300 people attended this session of which 150 were new

attendees. This session lasted approximately till 9:00 PM. In both sessions, only one issue was of concern to the group. That issue regarded Wilderness designations. The 50 people who spoke were against designation of any future wilderness study areas and particularly the New Water Mountain WSA discussed in our draft document. It was apparent that those who did not speak at sessions one and two (with the exception of two individuals) were also against future Wilderness designations. This was felt by speaking to individuals at sessions one and in two occasions a show of hands in session two. The group opposed future Wilderness designations for three basic reasons:

1. It would eliminate multiple-use as it is known today.
2. It would cause an economic burden to the community.
3. It is a discriminatory action against the elderly who cannot physically walk into remote areas.

Others felt that a) we should not have a plan, b) we should leave things in status quo, and c) feel that Wilderness designations are another step toward complete closure of the public lands.

In both sessions, I encouraged the group to document their concerns and comments by letter to our Phoenix District Office by May 2, 1985.

Now I would like to take a few minutes to bring you up to date on where we are to this point and where we are going in reparation of the Lower Gila South Resources Management Plan (RMP) and Wilderness Study Area (WSA) Environmental Impact Statement (EIS) process.

As summarized on Page 91 of the Draft document, we began work on the plan in 1978 with inventories and public meetings on Wilderness. In 1980 we issued a public Notice of Intent to prepare the Lower Gila south RMP. Between 1980 and 1981 we worked with local, state and federal officials to identify issues to discuss in the plan. On May 24-26, 1983, we held public meetings to help formulate the five issues addressed in this document. On February 1, 1985 we published the Draft Lower Gila South RMP and Wilderness EIS for public review.

The Draft RMP part of this document discusses the following five issues:

1. Rangeland Management
2. Wilderness
3. Land Tenure Adjustment (Disposals and Acquisitions)
4. Utility Corridors
5. Fred J. Weiler Greenbelt.

Each of the issues, other than the Fred J. Weiler Greenbelt, is analyzed under a Proposed Action and four alternatives.

The Draft Wilderness EIS Supplement part of this document analyzes in detail each of the 12 WSA's under a Proposed Action and three alternatives.

As Lawrence McHenry stated, this hearing is to obtain comments and information regarding this document in an open forum. In addition, we will accept written comments on the document through May 2, 1985. At the conclusion of the comment period on the Draft document, the RMP and wilderness Supplement will be separated and processed individually.

As summarized on Page 231 of this document, the next step (Step No. 8) in completing the RMP will be for the Phoenix District Manager to review the comments and information received through our public hearings and meetings, and written comments received by May 2, 1985. Then the District Manager will select a proposed RMP and publish it along with a Final EIS on all the issues except Wilderness. A final decision will be made on the RMP after the completion of the appeal period or successful review of any appeal received.

The Wilderness Supplemental EIS will be reviewed in light of the comments received through the public hearings and meetings, and written comments reviewed by May 2, 1985. Then the Phoenix District Manager will prepare a Preliminary PEIS and submit it to the BLM Director in Washington for review, approval and filing. Following the approval of the PPEIS, we will make our

recommendation on Wilderness Designation to the Arizona State Director, BLM Director and the Secretary of Interior. In turn, the Secretary, by 1991 will make a recommendation to the President who has till 1993 to submit to Congress for a final decision.

Thank you, Mr. McHenry.

MR. McHENRY: Unfinished statements may be supplemented by written comment. You may also submit written comments up until May 2, 1985. These comments will be considered fully in developing the final proposed plan and environmental impact statement. Written comments should be addressed to:

District Manager
U.S. Dept. of Interior
Bureau of Land Management
2015 W. Deer Valley Road
Phoenix, AZ 85027

After public comment period closes on May 2, 1985, there will be a thorough review of the draft EIS. The Bureau of Land Management's Phoenix District Manager will evaluate your comments concerning the planning issues and recommends a final proposed plan and environmental impact statement to the BLM State Director. The State Director will then review and later approve and publish the plan and EIS.

Your comments will be considered by the BLM State Director in making his recommendations to the BLM Director in Washington, who must then make a recommendation to the Secretary of the Interior. After due consideration, the Secretary will transmit his recommendation to the President. The president in turn will transmit his recommendation to Congress. After appropriate consideration, the Congress will accept, reject, or modify the President's proposal. Only Congress can designate an area as wilderness, and only Congress can release a BLM wilderness study area from its study status.

As you can see the BLM preliminary proposal before you will undergo a comprehensive review. This public hearing and your comments and views are a very important part of that review.

This is not an adversary proceeding--any questions asked would be in order to clarify a point or issue roused by the speaker or the plan and EIS. Direct your questions to me and I will make a determination as to whether it will be answered or not.

JACK PURSLEY: I am Jack Pursley, Director of Public Affairs of the Arizona Mining Association. The Association represents the 15 major mining companies that produce most of the copper, molybdenum, silver and gold in the state.

I am commenting here today because the Association is seriously concerned about the continuing actions of the Federal government to remove and

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restrict public lands from productive use. Approximately two-thirds of all public lands in the United States are now effectively withdrawn from mineral development. In Arizona, existing wilderness areas total 2,000,000 acres and it has been determined that approximately 30 million additional acres (two-thirds of the Federal lands in Arizona) are unavailable or highly restricted to mineral resource development by other withdrawals including BLM Wilderness Study Areas, Forest Service Wilderness Study Areas, Primitive Areas, Scenic Areas, Game Preserves and Refuges, Parks and Monuments, Defense Department withdrawals, Indian lands and numerous other withdrawals. Each of these categories has been formed by individual withdrawal actions with little or no consideration to the cumulative effect of all withdrawals in Arizona. The Association feels that this cumulative effect must be addressed and considered in this EIS.

The Draft Lower Gila South, Resource Management Plan (RMP), proposed action recommends 4 Wilderness Study Areas (WSA); New Mountain, totaling 189,750 acres suitable for wilderness. The draft lists 3 of the areas as having high mineral potential or mineral potential development and one having medium mineral potential. The draft also points out that these areas do not represent unique ecosystems: The creosote-bursage habitat and the paloverde mixed cacti habitat are already protected in 104 wilderness areas of over 4.5 million acres. These WSA clearly qualify for multiple uses. It is the Association's position that these areas should be deleted from wilderness recommendations because of their mineral potential.

The Association is compiling data submitted from the geologic departments of our 15 member companies that will substantiate the mineral potential in the Lower Gila South Areas.

The New Water Mountains have mineral potential for gold, silver, lead, copper, moly, zinc and manganese. The existence of deposits of sheelite, the potential for perlite, and outcrops of marble have also been identified in this WSA. The same holds true for the Eagletail Mountains. There are known deposits of gold, silver, copper, and molybdenum. Additionally, manganese, barium and lead carrying veins have also been identified. There are also 560 acres of privately owned mineral estate in this WSA that would have to be acquired before this area could be designated wilderness. In the Woolsey Peak WSA there are extensive copper deposits that have produced significant tonnages of medium grade copper ore. Lead, silver, and gold have also been mined with good results. When describing the mineral potential of the Table Top Mountains the RMP states "The mineralization is more diverse and more concentrated than any other WSA studied in this supplement. Copper, gold, lead, silver, zinc, manganese, and iron have been mined... The presence of hydrothermal mineralization has been found in several localities of the WSA".

The Arizona Mining Association will submit written detailed comments prior to the deadline. At this time, we feel that the RMP/EIS is inadequate in a number of respects. In particular, we are certain that the RMP/EIS should be redrafted to more fully reflect the cumulative effect of all withdrawals in Arizona and U.S. mineral policies currently in effect. In addition, the

Association recommends that all four areas listed under the proposed action be deleted from further wilderness consideration due to their substantial mineral potential.

We appreciate this opportunity to submit comments.

MS. BOBBIE HOLADAY: I recommend that all of the areas addressed in the Lower Gila South Environmental Impact Statement be designated for wilderness areas.

While some acreage may be unsuitable for wilderness management, such as the southern plains of the East Clanton Hills WSA, major portions of all areas have acreage which meet the wilderness criteria for naturalness, outstanding opportunities for solitude and primitive and unconfined recreation.

While this statement recommends that portion of four of the areas, New Water Mountains, Eagletail Mountains, Woolsey Peak, and Table Top Mountains as wilderness, large acreage cuts are recommended which would severely degrade the wilderness integrity of the areas. Plant and wildlife would suffer and the quality of life particularly for the bighorn sheep would be seriously impacted.

The main conflict appears to be in the mining operations. It is difficult for me to understand the growing need for more and more areas for minerals and energy resources in Arizona, when this industry is already depressed in established mines. What is the continued need for discovering more and more possible ore bodies, when this industry can't handle the operation of existing mines?

Large portions of the eight areas dropped from wilderness consideration should be recommended for this designation. Releasing them for multiple use would be damaging to many fragile desert mountain landscapes and many special-status plant species. These areas all contain significant habitat for several desert wildlife species. Opening these areas to mining activities and motorized recreation would seriously impact the desert bighorn sheep because they cannot reproduce in disturbed areas and their populations would decrease rapidly.

Many of the areas in the Gila Lower South have important historic value and excellent opportunities for archaeological studies. Many sitings have been made of petroglyphs, broken pottery, and other indications of prehistoric dwellings. If these sites go unprotected by the wilderness designation they are subject to vandalism and their values will be lost for all time.

I congratulate the BLM for producing a thorough and comprehensive statement on the Lower Gila South. My hope would be that further consideration be given to reinstating the dropped areas and in reestablishing the acreage in the four recommended areas to preserve them for wildlife habitat, primitive recreation, solitude, and scientific study.

JONI BOSH: My name is Joni Bosh, mailing address is Box 16-673, 2515 E. Thomas Road, Phoenix, Arizona 85016. I'm speaking tonight as vice chair for the Grand Canyon Chapter of the Sierra Club and as coordinator for the Arizona Wilderness Coalition. My comments are directed at the wilderness component of the plan.

First, some general comments. Clearly the BLM has picked outstanding areas to recommend for wilderness. The agency deserves strong support for including areas offering sizeable acreage and various topography. It's clear that the Phoenix District appreciates that wilderness can be horizontal as well as vertical, and that there are many remarkable cultural, wildlife, ecological and recreational values in the District that can be protected through wilderness designation.

We are sorry, however, that just a fraction of these special values would be saved under the draft recommendations. The BLM is missing a great opportunity here -- one that might not come again.

Too often our public lands are fragmented by development or mixed ownership into parcels that, even if saved, are only small oases of protection. In the Lower Gila South, there are clusters of WSAs that still provide the chance to protect significant wildlife ranges, viewsheds and ecosystems. And it's unusual indeed for so much wild land to be so close to one of our nation's largest metropolitan areas. The future recreational benefits from this open country should weigh heavily in favor of generous wilderness proposals.

We strongly urge the BLM to recognize these opportunities at hand and to act now to save these values for the future by significantly increasing your wilderness proposals.

Some of the impacts of various wilderness proposals are displayed on page 113 of the draft plan. The numbers here suggest the same points I've just tried to make.

Notice that even the so-called "resource protection" alternative, which adds three more areas to your wilderness proposal, still only protects roughly half of the desert tortoise and bighorn sheep habitat, and sensitive cultural resource areas. Your WSAs are among the last remaining places that can protect these values, and yet only a few of these areas are recommended for wilderness.

In contrast, even the raw numbers show relatively little development potential would be foregone even under an all-wilderness alternative. These development opportunities fade even more in insignificance when you figure that ranching can continue in wilderness, and that the existence of mining claims bears little relation to the likelihood of mineral development.

The problems of inholdings and split mineral estates are land management problems that will plague the BLM with or without wilderness. Proposing an area for wilderness can help focus attention from the Governor's office and for the Land and Water Conservation Fund to help clear up these problems.

In short, there are lots of reasons for more wilderness than is proposed in the plan, and we hope the BLM will take another hard look and increase their recommendations.

(87-B)

Now I'd like to turn to a few individual areas.

The New Water Mountains proposed wilderness makes a wonderful neighbor to the contiguous Kofa National Wildlife Refuge to the south. However, it's very disturbing that 10,000 acres of crucial bighorn sheep habitat are excluded from the recommendation. The proposed wilderness boundary should be modified to include more of the New Water and Dripping Springs lambing areas, and should be extended north to the freeway to provide a protected route for sheep travel north and south.

The BLM notes that almost the entire WSA is now protected under a temporary mineral withdrawal because there is a pending proposal to include this area into the Kofa Refuge. If the BLM won't protect more of the bighorn habitat in this area, turning this area over to the Fish and Wildlife Service may be the best solution.

The BLM says that neither Little Horn Mountains West nor Little Horn Mountains contain very spectacular wilderness values. Then the BLM describes two areas that contain such features as window arches, two 800-foot deep canyons, colorful volcanics and crucial desert bighorn refuge habitat. And all of this borders the Kofa National Wildlife Refuge wilderness proposal on one side, and the BLM's proposed Eagletail wilderness on the other.

Here is a perfect opportunity to provide protection for major parts of an important bighorn sheep range by typing some mountains and basins together.

The BLM should seriously consider adding acreage to a wilderness proposal which would connect the Eagletails with Kofa for the benefit of the sheep as well as the wilderness visitor who seeks an extended trip. The mineral potential is unimpressive and localized, and so it should be easy to add significant acreage without noticeably harming the mineral industry.

The Eagletail Mountains are an outstanding area, and the BLM deserves high praise for recommending for wilderness not just the mountainous areas but the broad basin in-between as well. We encourage the BLM to seek to trade or buy out the inholdings and split estates with the State and other owners to tidy up land management problems.

We suggest the BLM take a look at some specific boundary modifications, too.

The proposed wilderness should include Courthouse Rock, a prominent and well-known feature to recreationists and sightseers on the north side of this area.

The "resource protection" boundary would expand the area to include more crucial bighorn range, and also would bring the wilderness down next to the road dividing this area from the Little Horns. These would be important adjustments to make to further protect the values here, the BLM has obviously seen are of wilderness quality.

The East Clanton Hills offer an opportunity to extend the Eagletail/Little Horn wilderness complex to the south to include some additional bighorn

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habitat in the Gila Bend Mountains. We strongly urge the BLM to look at this series of WSAs from the New Waters to the East Clanton Hills as a whole, and as a unique chance to save an entire range for bighorn sheep.

Face Mountain, in contrast to other areas in Lower Gila South, seems to have too much solitude for the BLM to recommend for wilderness. We think Face Mountain deserves protection because it is remote, it is rugged and the conflicts are negligible. The BLM notes that the eastern quarter of this area has been nominated to the National Register in recognition of the archaeological resources there. Wilderness designation would be an excellent protection for this area because it would close the area to mineral entry and thereby discourage surface-disturbing exploration activities that might destroy the cultural sites.

Working with the State to trade out the state lands on the south side of the area could provide additional access and recreational sites that could enhance the WSAs attraction as a wilderness recreation spot.

Woolsey Peak and Signal Mountain should be considered as one wilderness unit. The BLM has recognized the prime wilderness values of Woolsey, but should complement that by proposing protection for the de facto north part of the area, Signal Mountain.

Both are crucial habitat areas for bighorn sheep, and both areas are noteworthy in part for the vistas they provide of one another. It just makes sense to think of them together as one unit.

One final note. The Phoenix District seems to have a thing about trains. You say that the noise they make detracts from the wilderness experience in Face Mountain and Signal Mountain.

Some of my best friends, and might even argue that they enhance the outdoor experience. Certainly their temporary noise is no greater an impact than the more constant sound of passing cars driving by the existing Red Rock-Secret Mountain Wilderness Area and the Superstition Wilderness area. Besides, the rail line past Face and Signal Mountain is lightly used compared to the main line next to South Maricopas and Butterfield Stage, for which you mentioned no train noise impact whatsoever. Train noise, like airplane noise, should not be a factor in considering these areas for wilderness.

The North Maricopas and Butterfield Stage Memorial WSAs deserve wilderness protection also. They really are one area, and should never have been separated. They are a spectacular and rugged range within easy traveling time of Phoenix. They contain crucial habitat for desert tortoise and bighorn sheep. Once on top, the hiker can enjoy commanding views of valleys and ranges in all directions. The BLM should at least try to protect the mountainous core and crucial tortoise areas. We strongly urge the BLM to relook at these two areas and propose a wilderness boundary to protect the important scenic, recreational and wildlife values there.

The South Maricopa Mountains are worthy of wilderness, too. For the same wilderness reasons and others, however, the BLM's description of this area is a little confusing.

Page 151 says "there are no known mineral occurrences of economical proportions in the WSA. The mineral potential is low..". Page 108 on the other hand says the area is not recommended for wilderness, in part, because of its mineral potential.

Page 108 also goes on to say that the area was not recommended because it lacks "superior wilderness characteristics" and because it's "a relatively flat bajada offering little to the primitive recreationist." Contrast those statements to some found on page 151: "Outstanding opportunities for solitude exist throughout the WSA" due in part to its "complex topography". "Outstanding opportunities for primitive and unconfined recreation exist in the South Maricopa Mountains.... The topographic relief found in this WSA provides the backpacker, horseman and photographer with a variety of places to explore...". Its all part of that book. And finally on page 108, the BLM reminds us that "The National Wilderness Preservation System has 609,667 acres of land with similar characteristics already designated, and 1.3 million acres of similar lands administratively endorsed as wilderness."

The BLM doesn't seem to know whether there are really minerals here or not. Nor does the BLM know whether this area is flat or undesirable to hikers. But the BLM is certain that it doesn't like the area for wilderness. As support for its case, the BLM cites how much Congress and the President do like wilderness areas such as South Maricopa Mountains, which we have about over two million acres.

This doesn't make any sense. What does make sense is to protect the known wilderness values there.

Last but not least is Table Top Mountain, and there is little we can say beyond a "bravo" for the BLM's strong wilderness recommendation here. This is one of the most remarkable areas in Arizona, and no BLM wilderness proposal would be complete without it.

We praise the BLM for choosing protection over mining in this area, and we will strongly oppose any effort to reduce the area recommended for wilderness protection.

To wrap it up, the BLM has proposed some very deserving areas for wilderness, and we will advocate designation for them to the best of our ability. But however valuable these places are to the wilderness system, they will be even more so as a part of a larger complex of wild areas comprised of much of the other WSA acreage.

We hope the BLM will choose to make the beginnings of good recommendations into great recommendations. Then it will be worth taking the proposals to Congress.

Thank you for this opportunity to comment on the draft plan.

TOM WRIGHT: My name is Tom Wright. My address is 6947 E. Sixth Street, Apt. 4, Scottsdale, Arizona 85251. I'm happy to see that four superb natural and scenic areas have been recommended for wilderness designation in the Lower Gila South. Each of these areas has its own distinctive character and all have important wilderness, wildlife, and recreational values. The

New Water Mountains, Eagletail Mountains, Tabletop Mountain, and Woolsey Peak all have my strong support for designation as Wilderness Areas. I am especially pleased that the proposed boundaries for Woolsey and the Eagletails include not only the rugged peaks, but also the wide valleys and flatlands that surround and lie between the peaks. Few such areas still exist in a pristine state and the BLM is wise to suggest that they be preserved while the opportunity still exists.

I was disappointed, however, that several additional areas did not receive favorable wilderness recommendations.

The Little Horn Mountains, which are split by a road into the two units, are a showcase of intriguing volcanic features. Opportunities for geological study are outstanding, and the harshly beautiful landscape is a superb setting for many forms of wilderness recreation including hiking, photography, and nature study. The Little Horns are also adjacent to the Kofa National Wildlife Refuge and contain important bighorn sheep habitat which would be protected from disruptive activities under wilderness designation.

Signal Mountain, separated from Woolsey Peak only by a primitive road, is nevertheless strikingly different. Woolsey is a broad volcanic dome with long, smooth slopes and a rounded summit, all composed of dark basalt boulders. Signal Peak, on the other hand, is a colorful and chaotic jumble of sharp peaks and ridges which present an entirely different and contrasting type of landscape to the wilderness visitor. It is, therefore, an important area if we are to preserve a truly representative sampling of Sonoran desert features in western Arizona.

Face Mountain, a volcanic mesa cut by numerous canyons, is described on page 108 of the EIS as lacking "outstanding primitive recreation opportunities" and "special features or unique resource values". The Wilderness Act does not require special or unique features, and whether or not recreational opportunities are "outstanding" is a highly subjective matter. The Act states that Wilderness Areas should have "outstanding opportunities for solitude or a primitive and unconfined type of recreation". Note the "or". The EIS admits (page 108) that Face Mountain does qualify in terms of size, isolation, and opportunities for solitude. Therefore, there is no basis for dropping this unit except for purely subjective ones. To those I would reply that any remote and rugged area of significant size and naturalness is "outstanding" in a state that is growing so rapidly and an ecosystem that has been abused so wantonly. No such area should be dropped from further consideration as wilderness without an excellent set of site-specific reasons, and no such reasons are given for Face Mountain.

The Maricopa Mountains, which are split by roads into two large units and a small one, were also dropped due to an alleged lack of unique or outstanding wilderness qualities. The EIS even goes so far as to say that the South Maricopas are "not particularly scenic". Compared to what, and in whose opinion? (The implications of this judgement are astonishing but I will not pursue them here.) The three Maricopa Mountains units together comprise about 150,000 acres of rugged Sonoran desert wildlands. Granted that they lack the awesome features, of say, the Superstitions, or the variety of the Mazatzal Wilderness Area, they still remain a major wilderness and recreational resource within an hour's drive of the largest city in the

American Southwest. This is not a fact to be taken lightly. The cherrystemmed roads, mineral inholdings, and ORV trails mentioned in the EIS are common problems in nearly every wilderness proposal statewide, and they can generally be worked out once a sincere effort to do so has been undertaken. I urge you to take a second look at all three of these units.

I would also like to comment on the East Clanton Hills, but it is the one unit in the EIS with which I am totally unfamiliar. I glimpsed it once from a distance and was impressed by what I saw, but I cannot speak to the area's particular values or conflicts. I will say, though, that any large-scale development or scarring in this unit would be easily visible from the Eagletail Mountains and perhaps from the Kofa Wildlife Refuge, diminishing the wilderness qualities in each of those areas. This should be kept in mind during the planning process for the East Clanton Hills area.

Thank you for your consideration of my comments.

Thank you, the next speaker is Lloyd Clark.

LLOYD CLARK: Mr. Chairman, Mr. McHenry, I am Lloyd Clark, P. O. Box 13344, Phoenix, 85002. I am a History Instructor for Rio Salado Community College, founder of the Counselor's National Military Post, which has been the National Organization interested in the identification, location, preservation, memorialization of old Military sites. In this area I refer to the map that's accompanying your very thorough study.

In Section 33, Township 5 South, Range 12 West, is Camp Horn. Camp Horn was one of those sites selected by General Patton in the outset of World War II, for one of the Desert Training areas. Camp Hire, Section 1, Township 5 South, Range 11 West, was another.

Camp Bow which is not included in this study, however is on the map, Township 8 North, Range 14 West. It is that Cunningham Wash Area that is shown on the map, however is outside the boundaries of the studied areas. These are three that were in the California, Arizona maneuver areas, which was also known as the Desert Training Center. Camp Bow is the one which is not included, is the only one that has real historic artifacts, if you wish to call it that, in the form of outlying accomplishments. The command circles, some of the bases for the buildings that were there. Bow's was a top secret base during World War II and it was where they planned to have illumination of the battlefield at night. They used searchlights, not enough by the remoteness kept it from being protected from the other areas around. It is the only one that really has something left there to preserve, with the exception perhaps, of Camp Horn, where there is still a perimeter marker that was left there fortunately by the Agricultural Interest Team near . What was there was put into cotton and other agriculture. But that marker still designates and memorializes the names of the nine soldiers who lost their lives during the training during World War II.

Camp Hire which is in the private area or private land in the interests of the only record of gates that are there besides the railroad tracks. Within the past six months all of the country streets, the old land circles

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(Tape ended.).....

Not on any federal or state land. That area is identified as Aqua Caliente it was a ranch at Woolsey. Woolsey being its name is the site where wheat was first grown in what is now Arizona. The southside of the river before they got it from the purchase of Mexico. And the reason the forces did not go out from Fort Yuma to try and followup the persons who committed the open massacres, the Indians, is because they fled to Mexico. This is one of those historic areas, and you address that rather virtually in the study and I just urge you to give it a little closer attention because it is a very historic period.

Were there any questions on what I have said?

Thank you very much, you have done an outstanding job and I appreciate all your full attention. Thank you.

Our next speaker is Landis Aden, Representing Honeywell Sportsman Club

1739 North 15 Drive, Phoenix 85026

Gentlemen, I'd like to say that I'm representing the Honeywell Sportsmen Club where a fairly large and varied amount club activities and outdoors. We enjoy hunting and fishing as well as our lakes and we've been generally in favor of wilderness areas, although we do have some serious concerns and reservations about the condition they are in this state.

First, as many of these areas seem to be as blessed and glorious quality and place you can establish for that. In the last year there has been about a million acres in wilderness taken out of Arizona and already in some places where you can find difficulty in access to existing areas, especially in the southeast part of the state where most of us have our activities also in the mountain zones.

Those of us who are not Congressmen or government officials and don't have access to helicopters have problems of finding places to park trailers on weekends or sometimes even getting through on access roads, such as they are. These problems are of course compounded on weekends for those of us who only have weekends off, which is your average working guy.

Also, regards to the Kofa area and Big Horn Chief Range, several of our members are members of the Big Orange Chief Society and we generally support their activities also. The addition of the New Water Mountains and the Little Horn Mountain areas could possibly make these access problems to the Kofa more difficult than they are now. The Kofa is one of my favorite areas. I do some wildlife photography there on the side. We appreciate the Kofa and we like it but we would like to know a little about it.

In conclusion, I would say that the wilderness quality areas probably aren't sufficiently in Arizona, and those of us who do have many interest in the outdoors besides just backpacking and photography, we also like hunting and fishing and going roaming in the desert or mountains and we would like to be left a place in Arizona to continue this interest.

Thank you for your consideration.

The next speaker is Leroy Ackerman representing American Indian Nations.

LEROY ACKERMAN: Mr. Chairman, Members of the District, my name is Leroy Ackerman and my box number is 349, Congress, Arizona and zip code is 85332.

I represent Small Miners Association of Arizona, miners prospectors and the Indian Nations of North and South America Central.

All I have to say is that I've worked in the area where your antelope were several years ago in mining some plains and animals were getting close to the machinery so what I had to do was get some alfalfa from the farmers below and the farmers would just take it up there so it could be hauled away. It got real bad, so I instructed my boy these animals you'd put signs up and they couldn't read. So I instructed my boy, Mike, to start night class to try to get these burros and mountain goats to come from Mexico up cross the trail they couldn't understand and so they in a few weeks, he come to me and he said "Well I've done the best I can do." I said o.k. and so one day I there was working and got off the machine, and I felt nudge in my back there and there was this donkey pushing me around the and he learned to talk and he said to me he said, "I need so many hardhats with two holes that can talk." Well I said "What do you mean?" He said, "Well I have taken over your job." And I thought well what am I going to do and so Arizona Wester College was over to the west so I went over there and talked to the Professor of Psychology. He said, "Mesa get out a map and study the

map and then, he said you may be wondering what to do." So I did and I went back and all I could do was mover all the way and the lesson I learned was if you give an inch they'll take a mile and that was a hard lesson to learn there so I left the area and I went back and started again and then two years ago they weren't interested in it so I took in another area and got out of there so that stands to reason that would be the same here, in that in the more area you take, the more you want and the less there will be for Mike and then when there is no Mike in the area and your natural resource is all produced then the communist will come in. And I can tell you one thing there, that's one thing I deal with instant hate is communism. When they hit the borders here, the north or south I'll grant you they don't go far up over the Mexican border. And that's what can happen if you close off all resources and then you're still that has to be shipped in from other countries and used and that's more cost to the people here.

I think, I believe in being fair with the wilderness and I don't believe in destroying it in as far as that goes. The reason is, I suppose is, that I have Indian blood in me on both side of the famile and also I have blood from eastern states and some other people from there that you have probably heard of . The Indian part I suppose helped me to appreciate the wilderness there, and the mountain area. I do have, when you go into the mountains, whether its New Mexico, Arizona or Colorado, for a mountain lion that followed me after awhile, and I had them when I lay the blankets and study your mountain areas in all of these states around and I mean I get out and walk with and study and see what's there from mineral and otherwise.

They'll follow me and as I lay still in the lights of night in your excluded areas in Sycamore Canyon the mountain lions come up to my blankets, touch me and then go away stay over and sleep 60 feet from me, talk the night and never bother me. If I was afraid the animals were every going to hurt me I wouldn't have done it. So there. I believe in having so much land for mining and so much of it for wilderness, and I think you have quite a bit. Land now for your wilderness, works best. You're going to have to have more personnel than what you have now to handle that business and more budget in your work.

And I know that there is good men in your office and that when this proposal goes before Congress there will be men there that money could sway the other way and would vote down your proposal, or vote for it, one way or the other. I do know that the good members of the committee good and bad, as your senators and representatives on the committee. Of course they may have a personal opinion of the area and people didn't know it and they kid of went around to different places and studied this thing and my area and other areas there and spots picked out and we will personally go to them in washington before this vote is all and meet with them and I will talk with the President of the United States on this business and see what the decision will be and how it goes. But many of us will keep on mining so that it will help the economy of this country and keep every man in America living not under communism and there ruling ways. Its the best way I know because I have been to Siberia under different conditions years ago when I was young and escaped across the waters back to Alaska. Bad hands and a little bit of torture, and I know what that can be, so I appreciate talking with you.

The next speaker is Edward Elton representing the small miners.

My name is not Edward, to get the records straight. It is Eugene Dee. Now that Edward comes from my initials E D as everybody calls me Ed. That is not the official name. I live in Congress, Arizona, 303 West Highway 71, 85332, Congress.

If you will look back at history, study history. You will find that history repeats itself. It is happening that way today. History is repeating, and if you don't benefit from the lessons learned from history, you're doomed to fall in the same pit.

Now some of you here remember 1929, I do. Some of you don't and it is you might say mythology to them because they haven't studied history. It is coming again, the same process. First National City Bank, Chemical Bank are all (someone coughed) loan. They are all going at a day to day pace, they can close up any time. You won't see it in the news media, but when you get behind the news media, you will find that is the truth, where you'll hear some of it. When that happens, when they close up, then 1929 is going to look like a Sunday picnic.

Further on down, right here in Arizona, I've talked to many old timers say we made our living by drywashing here, we made it, we had a little mine up here we made for our families, we supported our families, that is how they got by. When or if this all put into a wilderness area again, or not again, but if it is put into a wilderness area, when it does blow up, which it will

do; these small miners, the individual is going into those hills if he knows where the place he is going to look for a place and when he finds that place, he is going to mine it. Because he has a family to feed. Now he isn't going to back up and say Mr. Billy Doe this is yours, my family can starve. He will be violating the law, which we put him for arrest. Then what will his family do when he is in jail for trying to provide for his family.

The welfare system now is tremendous. It is more than they can handle. So that will just create more, there will be no money, there will be no taxes because nobody will have any money. But here you will make a violator out of a man that is just trying to provide for his family and his people. There is a lot of land already in wilderness areas, I don't know how well it is managed, but to the best of the ability.

Now these persons that want this wilderness area put in here. It's those states that no motor vehicle is allowed in that area. Now if any of them had the opportunity to go to Quartzsite in every winter, every February, and see the thousands of people that come there to enjoy those areas, they are not able to flock into that area. They'd have to drive a vehicle. If they can't drive they don't see it. They, just off the top of my head are 60% of the people that enjoy those wilderness areas that are proposed.

These that want this, are suppressing their children. Maybe a lot of these children won't be able to walk, in that time they won't be able to drive either or they won't have the money for the gasoline. They will not be able

to enjoy what their folks are trying to preserve for them. It's a lost cause. Here's this area, says you can't go in here, alright that's fine right now. But when it comes to the bottom line if it is restricted, then nobody will enjoy that, they can't get to it. The small miner, the prospector, or even you might say some of the your city dudes that will eventually go to the hills to seek gold because there is always a quest for gold, a quest for silver. That has been tightened and suppressed for years, since time memorial, they have tried to play down gold and silver and precious metals. But yet today, that is a basis to the economy.

If they suppress all this mining, if there was no mining people would be still eating out of clay dishes. Mining is a basis for all prosperity and all economy. If there wasn't mining, there wouldn't be anything we'd be using bow and arrows yet. And there is a lot of suppression of the mining right now, right in this country by the foreigners, the foreign market flooding this right here.

I am very opposed to putting anymore land into a restricted area, because how many acres does a Bighorn sheep need to feed on? I don't know what it is around here, but they usually range around a 20 miles. Your mountain lions range roughly around 20 miles. Your deer, your coyotes, 20 miles area. And I venture to say there is more land taken out already that each Bighorn sheep will probably have 50 miles to range in. I have been told that the Bighorn sheep are in poor health, they're wormy, so why preserve the whole area just for a few?

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I'm just opposed to that because I see in the future where it is going to be the necessity for survival of many of us to go wherever possible and make a living for your family, wherever you can and whatever you can without having the threat of arrest or a jail term hang over your head.

Thank you.

The next speaker is Princess Teni-Ciache Ackerman representing the American Indian Federation.

We are totally opposed to this wilderness. We have seen, we have heard the phrase "As long as the sky is blue the water runs, the grass grows." Poopy Doo! We are down to less, than a fourth of this nation, even less than that, and it keeps getting worse each and every day.

I have seen the Bighorn Sheep of the Kofa Mountains, and I can tell you this. They're wormy, they're mangy, they are in the most defect health. There supposed to be being protected, huh? There supposed to being managed, yet nobody is caring for their health, that's not management.

You talk about the rangeland instead and people want all of this wilderness. The kind that it won't hurt. It will hurt, it'll hurt the ranchers, it will take out jobs. If they can't graze and they have to start buying feed, hay and all. Hay is going for \$4.75 a bale, for decent hay that you feed your animals. The cost of that and if you have to take out land from other banks, from your cattle to put it into crops, you're going to lose, you're going to go in the hole.

Right now canner beef is running \$25.00 a hundred pounds. A hundred pounds, to get it up to that, is going to run you close to \$150. I tell you somebody is going in the hole someplace. Because about the energy and economy impact, it's going to be one mean impact, because people are going to start losing their jobs, their income. When people have to be laid off its a chain reaction, it's just right down the road. I am beginning to wonder who this, what right is final with this country. I thought the U.S.A. was for all free men. I can the constitution says "For the people and by the people.." it does nowhere state "...for the few, by the few, or by the bureaucracy." It's about time that people start caring. I care about the Bighorn sheep, you can ask anybody from Congress on, ask them if they want to cross the creek on my mining claims and shoot at an animal. It's a well known fact that it's open season on hunters. We feed the animals up there. There isn't a miner wonder that. Each and every day, when I lived down by Yuma, I moved into the Kofa on horseback. Hauling hay for sheep, cause they would come up and eat out of my hands. They were the most real thing. I spent over \$200 in one year getting worm medicine, which wasn't easy to get. I had to send back east for it because I couldn't find a place to tell me how to treat them here. So I called the Wildlife Association, State of Oklahoma, Mr. C. Viego was working there then. He told me just what to use and he said, "I could send you some." I paid him for it, because he couldn't afford to take it out of their bank to send out here.

I have called the Wildlife Association here, I have called the Field and Management and everything, and I was referred from one agency to another. A

big run around because nobody wanted to answer any questions, everybody was afraid. I don't know what they're afraid of, but it is about time we all started fighting for the same thing. We do need wilderness, but we don't need this much.

It was stated yesterday at Quartzsite about a landing area, like Mr. Elton said, say around 20 miles, I have seen this. Now how much ground does it take for one mule to lay around? Maybe a bigger square as that table if your lucky, and yet you want all these thousands and thousands of acres.

People like me, I'm also a Viet Nam vet. My hips are messed up and if you want I can bring reports from a commander of the military at Fort Whipple, Arizona. I cannot go into those areas because I cannot walk right. It could pinch the nerve and cripple me for life, if I fall right or have to step over too high an inc. And if I am in that condition in my hips, how much will the older people, if I remember correctly that there is a law against discrimination. And that would be out and out discrimination on the ones that can't that can't get in there. They love the scenery, they love the animals and the beauty just as well as any of us. But when they have to be restricted to a little area, you got to look at it from here you can't take a vehicle in there, it might scare up sheep. Those sheep aren't scared of us, because if they were they would not be on that bombing range three-fourths of the time. And they are on it.

The military has had to hold up their bombing so many times it's pathetic, for the simple reason that the sheep are out there. And the sheep wasn't

the least bit scared, so human beings aren't going to hurt them. Human beings have too much of a tendency to love something wild and want to protect it. Well not all of this works. If this nonsense keeps up, the wilderness out and no minerals to be dug out of this country, just like our rights today. Ninety-nine percent of it comes from the Soviet Union. That is on a letterhead that came out a few years ago from the Department of the Interior, when they wanted to open more minerals it was proven that platinum claims that there is none in this state for instance. It comes from the Soviet Union. Our ore and stuff is coming from Soviet block countries and back country. I'm not supporting no Communist!

The people came to this country for one reason, that was to get away from the suppression and everything else. They didn't care if they had freedom, they could live, they could work, they could support their families and nobody could tell them no. Well, if anyone can step back and look back at Poland, they had wilderness control, they had gun control and look at them now. I'm not giving up without a fight, for anybody. It is my right as a human being and this is America, to be able to mine. And if I want to go and look at the Bighorn sheep and I can't walk, I'm going to drive and I might get arrested, but I guarantee you I'll fight you to the Supreme Court on it.

Thank you

Thank you very much. Are there anyother persons in the audience who would like to make a comment? Submit any statements?

Mr. McHenry let me just add a p.s. to one thing else.

Would you please give us your name again?

Yeah, Lloyd Clark. And I forgot to mention the area down there in land which is immediately, its in the area we have a pipeline on but immediately north (Unable to make out recording.)

Thank you sir. I've been told by the District Manager at the close of the meeting to staff they'll be available. If there are no other persons who wish to make any public comments. The meeting is now closed. Thank you very much for your participation, we'd like to thank the Maricopa County Board of Supervisors for letting us use this auditorium and we'd like to thank the public for showing up tonight.

BEFORE THE
BUREAU OF LAND MANAGEMENT

PUBLIC HEARING ON THE
LOWER GILA SOUTH PLANNING AREA
OF THE PHOENIX DISTRICT

Gila Bend, Arizona
March 13, 1985

Prepared for:
THE BUREAU OF LAND MANAGEMENT
(ORIGINAL)

BARRY & GAUMLEY
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By: **BONNIE SUMIDA**

1 BE IT REMEMBERED that the above-entitled matter
2 came on regularly to be heard before the Bureau of Land
3 Management, at the Gila Bend Community Center, 202 North
4 Euclid Avenue, Gila Bend, Arizona, on the 13th day of
5 March 1985, commencing at 7:10 p.m.

6 Presentations were made on behalf of the Bureau
7 of Land Management by Beaumont C. McClure, Deputy State
8 Director for Lands and Renewable Resources; William
9 Childress, Area Manager for the Lower Gila Resource Area;
10 Richard B. Hanson, Recreation Planner in the Phoenix
11 District; and Timothy L. Sanders, Acting Chief of
12 Planning in the Phoenix District.

13
14 MR. MCCLURE: Ladies and gentlemen, this public
15 hearing will now come to order. My name is Beau McClure.
16 I am the Deputy State Director for Lands and Renewable
17 Resources in the State of Arizona for the Bureau of Land
18 Management. I have been appointed by the Arizona State
19 Director of the Bureau of Land Management to conduct this
20 public hearing under the authority of the Secretary of
21 the Interior concerning the resource management plan for
22 the Bureau's Lower Gila South planning area of the
23 Phoenix district.

24 Most of you have already signed the attendance
25 sheet as you came into the room. If you have not done

1 so, I would like to encourage you to sign in now so that
2 we can have a written record of tonight's attendance.

3 If you plan to make a statement this evening,
4 be sure to check the appropriate space on the attendance
5 sheet so that we can add your name to the list of
6 speakers.

7 The official reporter this evening is Bonnie
8 Sumida. She is seated to my left. She will prepare a
9 verbatim transcript of everything that is said at the
10 hearing this evening. If you wish to obtain a copy of
11 the transcript, you should make your own arrangements
12 with the reporter.

13 This public hearing is being held to obtain
14 information relating to the five planning issues and five
15 planning alternatives that are being studied by the
16 Bureau of Land Management in the Lower Gila South
17 resource management plan. A draft environmental impact
18 statement, an EIS, has been published, and is available
19 here in this room for those of you who have not already
20 received a copy.

21 This hearing centers on two aspects of the
22 plan. First are the range of alternatives and proposed
23 planning decisions adequate? The Phoenix district is
24 particularly interested in information concerning the
25 suitability or unsuitability of the 12 wilderness study

1 areas for wilderness designation. Your views and any
2 information you can offer with respect to the
3 alternatives will be greatly appreciated.

4 Second, is the draft environmental impact
5 statement adequate? Your comments and suggestions on
6 this aspect of the study will also be appreciated.

7 In arranging for this public hearing, notices
8 were sent to United States Senators Goldwater and
9 DeConcini; U.S. Representatives Udall and Stump; Governor
10 Babbitt and other elected officials. Notices also have
11 been sent to federal, state and local governmental
12 agencies and organizations and individuals known to be
13 interested in this planning effort.

14 Now, for a few words about procedure. This
15 hearing is not a debate, a trial or a question-and-answer
16 situation. It is an advisory hearing, and all interested
17 persons may present statements, either written or oral or
18 both, or other information pertinent to the resource
19 management plan we're considering tonight. There will be
20 no cross-examination from the audience, but if anyone
21 fails to understand the statement of any speaker, you may
22 direct a clarifying question to me, and I will determine
23 whether it is pertinent. This may seem overly formal,
24 but it is intended to give everyone a fair and reasonable
25 opportunity to present his or her view.

1 When I finish my opening statement, I will call
2 on a Phoenix district representative to explain the
3 process that has occurred to date. That presentation
4 will take about five or ten minutes. Then I will call on
5 any elected government officials present who wish to make
6 a statement. After that, we will proceed with other
7 speakers.

8 In view of the small number of people who wish
9 to speak tonight, I am not going to set a time limit.
10 Any written statements submitted here tonight will be
11 included in full in the transcript, and will be
12 considered on the same basis as the oral comments. You
13 may also submit written comments until May 2, 1985, and
14 these also will be considered fully in developing the
15 final proposed plan and environmental impact statement.
16 Written comments should be addressed to the District
17 Manager, Bureau of Land Management, Phoenix District
18 Office, 2015 West Deer Valley Road, Phoenix, Arizona
19 85027.

20 The publication and distribution of the draft
21 EIS completes the first part of BLM's resource management
22 planning for the Lower Gila South planning area. Now, it
23 is the public's opportunity to comment on the matter.

24 After the public comment period closes on May
25 2nd, 1985, there will be a thorough review of the draft

1 EIS. The Phoenix district manager will evaluate your
2 comments concerning the four planning issues that do not
3 relate to wilderness, and recommend a final proposed plan
4 and environmental impact statement to the BLM state
5 director. The state director will then review, approve
6 and publish the plan and final environmental impact
7 statement.

8 The procedures for the wilderness portions of
9 the resource management plan differ somewhat from those
10 for the other four planning issues. The BLM state
11 director will consider your comments in making his
12 recommendations to the BLM director in Washington, who
13 must then make a recommendation to the Secretary of the
14 Interior. After due consideration, the Secretary will
15 transmit his recommendation to the President. The
16 President, in turn, will transmit his recommendation to
17 the Congress. After appropriate consideration, the
18 Congress will accept, reject or modify the President's
19 proposal. Only Congress can designate an area as
20 wilderness, and only Congress can release a BLM
21 wilderness study area from its study status.

22 As you can see, the BLM preliminary proposal
23 before you this evening will undergo comprehensive
24 review, and this public hearing and your views are a very
25 important part of that review process.

1 Now, I would like to introduce Bill Childress,
2 who is area manager for the Lower Gila resource area on
3 my right. Also, next to him is Rich Hanson, Phoenix
4 District Recreation Planner, and Tim Sanders, Acting
5 Chief of Planning in the Phoenix District. Mr. Childress
6 will now explain the Bureau of Land Management's planning
7 process to you, but, first, I would like to explain
8 again, that this is not an adversary proceeding. If you
9 want to ask a question in order to clarify a certain
10 point, please feel free to do so. Direct your questions
11 to me, and I will determine whether it is pertinent.

12 Bill?

13 MR. CHILDRESS: Thank you, Mr. McClure. I would
14 like to take a few minutes to bring you up-to-date on
15 where we are on this plan, and where we are going in
16 preparation of the Lower Gila South resource management
17 plan and wilderness study area environmental impact
18 statement process.

19 As summarized on page nine of the draft
20 document, we began work on the plan in 1978 with
21 inventories and public meetings on wilderness. In 1980
22 we issued a notice of intent to prepare the Lower Gila
23 South resource management plan. Between 1980 and 1981 we
24 worked with local, state and federal officials to
25 identify issues to discuss in the plan. On May 24

1 through 26, 1983 we held public meetings to help
2 formulate the five issues addressed in this document. On
3 February 1, 1985 we published the draft Lower Gila South
4 resource management plan and wilderness environmental
5 impact statement for public review.

6 The draft resource management plan part of this
7 document discusses the following five issues: Rangeland
8 management, wilderness, land tenure adjustment, which is
9 disposals and acquisitions, utility corridors, and the
10 Fred J. Weiler greenbelt.

11 Each of the issues, other than the Fred J.
12 Weiler greenbelt, is analyzed under a proposed action and
13 four alternatives.

14 The draft wilderness environmental impact
15 statement supplement part of this document analyzes in
16 detail each of the 12 wilderness study area's under a
17 proposed action and three alternatives.

18 As Mr. McClure stated, this hearing is to
19 obtain comments and information regarding this document
20 in an open forum. In addition, we will accept written
21 comments on the document through May 2, 1985. At the
22 conclusion of the comment period on the draft document,
23 the resource management plan and wilderness supplement
24 will be separated and processed individually.

25 As summarized on page 231 of the draft

5 - CONSULTATION AND COORDINATION

9

1 document, the next step, which will be step no. 8, in
2 completing the resource management plan, will be for the
3 Phoenix district manager to review the comments and
4 information received in this public hearing and meetings,
5 that we are holding, and written comments received by May
6 2, 1985. Then the district manager will select a
7 proposed resource management plan, and publish it along
8 with a final environmental impact statement on all the
9 issues except wilderness. A final decision will be made
10 on the resource management plan after the completion of
11 the appeal period or successful review of any appeal
12 received.

13 The wilderness supplement environmental impact
14 statement will be reviewed in light of the comments
15 received through the public hearings and meetings and
16 written comments also received by May 2, 1985. Then the
17 Phoenix district manager will prepare a preliminary final
18 environmental impact statement, and submit it to the BLM
19 director in Washington for review, approval and filing.

20 Following the approval of the preliminary final
21 environmental impact statement, we will make our
22 recommendation on wilderness designation to the Arizona
23 State Director, BLM Director and the Secretary of the
24 Interior. In turn, the secretary by 1991 will be
25 required to make a recommendation to the President. The

1 President has until 1993 to submit to Congress his
2 recommendation for a final decision.

3 Thank you, Mr. McClure.

4 MR. McCLURE: Thank you, Bill. Is there anyone
5 here representing Governor Babbitt or any members of
6 Congress or any of the State legislature?

7 MRS. ACKERMAN: Do you mean for the State of
8 Arizona?

9 MR. McCLURE: Do you represent the governor?

10 MRS. ACKERMAN: Do you mean any of the senators for
11 the State of Arizona?

12 MR. McCLURE: Yes, ma'am.

13 MRS. ACKERMAN: Our group is representing Senator
14 Bradley, who is over energy and commissions on wilderness
15 and such from New Jersey.

16 MR. McCLURE: Would you like to speak?

17 MRS. ACKERMAN: I spoke at the Phoenix hearing, me
18 and my husband, both last night. Mr. Rogers might.

19 MR. ROGERS: Yes.

20 MR. McCLURE: Would you like to speak now?

21 MR. ROGERS: Well, yes.

22 MR. McCLURE: Would you like to come up to the
23 podium?

24 MR. ROGERS: I think I can talk loud enough for
25 everyone to hear me without it.

1 MR. MCCLURE: Would you state your name and
2 proceed.

3 MR. ROGERS: I am Roy Rogers of Wickenburg, and I
4 have been working in that area of mining almost 31 years.
5 However, I'm a miner from the age of about 14 over
6 various parts of the country, including Alaska, Canada,
7 several other parts of the country.

8 Now, I wonder about this land situation. We
9 have heard a lot of pros and cons about it. Of course, a
10 lot of it may not be true; a lot of it may have just a
11 smattering of truth, of taking out this, that and the
12 other thing. Well, miners in our area get along
13 beautifully with the cattle owners, and as far as
14 bothering any wildlife, I have worked out in the desert
15 there for months at a time. I have dug ditches, and
16 looked right up there. I have seen these cubs playing
17 along the edge of where I was working, and rabbits and
18 quail, you have to almost step on them to get them out of
19 the way, and I don't think I have ever had any trouble or
20 seen any of the wildlife up there that was disturbed.

21 Now, we have pretty good-sized deer and bucks
22 running through various parts of our ranges, and I have
23 them come over and drink water right out of the tubs
24 where I leave on the outside. We see the footprints the
25 next morning when I come out, and I got to where I leave

1 little scraps out for the little mountain lion and their
2 cubs.

3 As far as the other night -- I should not bring
4 this up, I suppose, at Quartzsite, but there was a heck
5 of a bunch of people over there. I believe it was more
6 than they expected. It seemed like everybody there, or
7 the majority of them, was all shook up over the land;
8 said they did not quite understand it.

9 A lot of the people coming down from the north
10 go out and look around, pick up stones and so forth. The
11 only complaints I got, which is a few, I never have
12 objected to any individual coming out and just picking up
13 souvenirs, because I have always thought it was good for
14 the country.

15 People come up to that part of the country.
16 They take home little, ol' rocks. Gee-whiz. You would
17 have to have a truck out there with several tons to hurt
18 anything in that area. Take those rocks home. Tell
19 them: We got this from Arizona, wherever it was, put it
20 upon the mantle piece. It may not be gold or anything,
21 not that Pyrite stuff, but 90 percent of them don't know
22 the difference.

23 So as far as I am concerned, I would like to
24 have the land, as far as the miners and ranchers, stay
25 just as it is, and I think that we will, with just a

1 little more understanding and a little better
2 communication, that landowners and miners and everybody
3 else can get along just fine.

4 Now, there is one thing I do object to as far
5 as the miners goes, and that is the way they do their
6 cyaniding. Now, I went over and worked two years to find
7 out how to do cyaniding properly by one of the best men
8 in the State of Arizona. Ted Houseley is recognized as
9 such, and I went over, and I would have paid him to
10 actually work for him, to find out what was actually
11 going on. I read a lot on it, but that reading and
12 actually doing it is two different things, and I worked
13 for him there for almost three years, and was glad to do
14 it. I thought it was equivalent to a college education.

15 I guess that is about all I have got to say. I
16 could stand up here, and talk a long time and not say a
17 bit more than what I have said. So I want to thank you
18 for this opportunity.

19 MR. McCLURE: Thank you, Mr. Rogers. Our next
20 speaker is Janel Smith.

21 MS. SMITH: Thank you, Mr. McClure. My name is
22 Janel Smith. I am a member of the organization which
23 represents the precious metals industry, including the
24 independent mining companies, exploration and development
25 companies, consulting firms and oil, gas and research and

1 exploration companies. I am also the state president of
2 the Arizona Small Mine Owners Association, which was
3 founded in 1938, and is the oldest mining organization in
4 the world.

5 Before I begin my comments on the environmental
6 impact statement, we have some concerns with this, and
7 would like to share them with you concerning the
8 procedure used on the Lower Gila South meetings and
9 hearings.

10 Evidently, because of a lack of communication
11 between the State Public Affairs Office and the Phoenix
12 District, the Arizona Update publication, which is an
13 in-house publication of BLM, left a lot of people in the
14 western portion of this resource area with the impression
15 that Monday's meeting at Quartzsite would be both an open
16 house and a meeting for comment beginning at 7:00 p.m.,
17 similar to those conducted at the Yuma district, which
18 they attended a week ago. There were 272 people at the
19 open house at 3:00 p.m. on Monday, who were informed that
20 the BLM would be interested in their comments at 7:00
21 p.m., but they would not be for the record except in a
22 similar capacity because no reporter was present. Mr.
23 Childress indicated these names would be entered into the
24 record at the Phoenix hearing on Tuesday with a summary
25 of comments; that the people should also write letters.

1 I have been informed today by my people there
2 was no reporter present last night, either, and a tape
3 recorder was used. However, they weren't sure if
4 Monday's speakers all got into the record or not,
5 although a summary of the record was taped.

6 We must confess, we are confused as to why the
7 Phoenix district cannot get their act together for these
8 hearings. Monday night was inexcusable insofar as the
9 public was concerned. Regardless of which office of the
10 BLM made the error, since the error was made, Lower Gila
11 should have been able to receive these comments into the
12 record. Since the tape recorder was used on Tuesday, why
13 couldn't one be used on Monday?

14 Another problem we are having trouble dealing
15 with is the use of vested interest personnel at these
16 meetings and hearings. We believe that management alone
17 has an obligation to conduct not only the meetings but
18 the open houses so that all user groups are treated
19 equally.

20 I refer to comments specifically Monday night
21 by a member of the inventory staff that the 3802 and the
22 3809 regulations were an amendment to the 1872 mining
23 laws promulgated in 1980. For anyone who is not familiar
24 with the regulation, 3802 and 3809 were a result of
25 FLPMA, and came down by secretarial order, not as a

1 law.

2 It would appear that the Phoenix District
3 either needs to have all of its disciplines represented
4 at these meetings and hearings or none of them. This
5 information on the part of any agency concerned with
6 managing the public land creates an element of mistrust,
7 and doubts of the credibility of the documents you are
8 presenting. Insofar as the document itself is concerned,
9 we find very little of substance in the minerals report.
10 It appears you did not see fit to use material supplied
11 in your own contract of gem reports. Since I did not
12 receive this information until February 22nd, it has been
13 impossible for us to collect the proprietary information
14 available to support our mineral position. That
15 information, therefore, will be forthcoming before the
16 end of the comment period. Consequently, tonight we will
17 give you an overview only of our position.

18 First of all, New Water Mountains, they carry
19 high mineral potential according to USGS and independent
20 results, some of which you already have, geological
21 inference of economic mineral deposits. They are
22 presently in official withdrawal. In addition to a
23 wilderness study area, this is a popular area for winter
24 visitors from the Quartzsite and Yuma areas for rock
25 collecting, camping and other uses.

5 - CONSULTATION AND COORDINATION

17

1 Minerals in the area include silver, gold,
2 copper, lead, zinc, tungsten, barite, manganese,
3 molybdenum and iron. This area has been actively
4 prospected and mined since the mid-1800s. Two years ago
5 the Bureau of Land Management patented two of the Ramsey
6 claims, which are just north of the present boundary.

7 As I advised the official Wildlife Service at
8 their hearing last Wednesday in Lake Havasu City, if the
9 Bureau of Land Management and Fish and Wildlife intend to
10 persevere for wilderness or other withdrawal for this
11 area, we are going to have no alternative but to take
12 this WSA and the withdrawal through the courts. This
13 area, in our estimation, has never met the criteria
14 mandated for wilderness because of the minerals, and if,
15 in fact, your primary concern is wildlife, those sheep
16 have been getting along with the mining and miners since
17 before the Bureau of Land Management, General Land
18 Office, Official Wildlife Service were mandated.

19 The Table Top area preliminary geophysical and
20 petrographic data from my company supports the
21 possibility of a major discovery for copper through the
22 middle of this WSA, probably averaging over one percent.
23 Producing mines in the Antelope Peak area in 1955 made
24 copper values better than one percent.

25 We have been recently notified by one of our

1 companies that a new silver discovery along the north
2 half of the WSA and preliminary data indicate that the
3 probability of economic value will warrant going into
4 production. Woolsey Peak has past production of gold,
5 silver, copper, lead, zinc, perlite, and tough building
6 stone. There is a high potential for both geothermal
7 wells and uranium occurrences.

8 The Signal Mountains area is a gold and copper
9 area for building stone. Exploration in the past has
10 shown geologic inference of massive sulphite deposits.
11 Face Mountain has past production records of silver,
12 lead, zinc, uranium, which could be an economic producer.
13 The East Clanton Hills mineral occurrences are in gold,
14 copper, silver, lead, and molybdenum, also, fluormica and
15 uranium. There has been past productions from the gold
16 mines.

17 Eagle Tail: This area contains gold, silver,
18 copper, lead, manganese, barium and molybdenum, and has a
19 favorable potential for economic development.

20 Little Horn Mountains West and the Little Horn
21 Mountains all run together. They have had deposits in
22 the occurrences of gold, silver, lead, copper, manganese,
23 iron and some molybdenum. South Maricopa has the
24 possibility of uranium and copper occurrences. North
25 Maricopa, there has been granite quarries in the

1 northwest corner, I believe it is, and geologic
2 information indicates the possibility of uranium deposits
3 at depth.

4 In summary, I would like to say that our
5 capability for production and development, our domestic
6 resource development, depends in part upon our access to
7 areas where these minerals are or may be present with the
8 possible exceptions of the inner most portions of the
9 Maricopa WSA. Most of these areas look down on to
10 developed roads, freeways, ranches, freeways and
11 settlements.

12 It is difficult to visualize the rationale of
13 someone climbing Black Mesa for solitude, only to find --
14 or an excellent view of Brenda or Quartzsite or Little
15 Horn Peak to communicate with nature -- and count the
16 semis at the Arco Truck Stop. We do not believe the
17 inventory of these areas are meeting the criteria for
18 wilderness.

19 Thank you very much.

20 MR. McCLORE: Thank you, Ms. Smith. Yes? Yes,
21 ma'am? You may come to the podium. Please state your
22 name.

23 MS. ACKERMAN: I believe Mr. Childress thinks it is
24 all my idea, but I have talked to Senator Bradley since
25 the last few meetings we have had all this week, all

1 week, as a matter of fact, and he expressed the same
2 concern that I have. I have been disabled in the Vietnam
3 War. Since Senator Bradley wears braces also -- He was
4 in the war. He was a commander there, and our main
5 concern, on a lot of this, not just the minerals, but if
6 I cannot walk in those mountains, any doctor can tell you
7 I could not. If we cannot, there is people like Mr.
8 Pfrimmer here that there is no way they can go and see it
9 without a vehicle, and he feels, as I do. It would be
10 discrimination against elderly and the handicapped.

11 Thank you.

12 MR. MCCLURE: Thank you. Is there anyone else who
13 wishes to speaks? Yes, sir.

14 MR. ACKERMAN: Mr. Chairman, and members of the
15 board, my name is LeRoy Ackerman. What I have to say
16 here, this last year there is companies we had interested
17 here in the areas west of here. About two years ago I
18 took them out, and did not pay any attention to them.
19 Geologists came and looked at it. I sent them to
20 different states. I don't remember where. In your
21 meeting, companies in development of minerals and the
22 copper companies and so on did not think too much about
23 it.

24 Finally we got word that they were interested
25 in this mineral. They wanted to know where this and that

1 and what as far as what the development of plants to
2 process the mineral and the feasibility of getting the
3 minerals out of the state, at the easiest way, or to ship
4 and so on.

5 So what I told them is that this mineral was in
6 an area where they have got access to the Southern
7 Pacific Railroad, and the feasibility of getting it out
8 without damaging the land; land would be stripped and
9 land put back in place, and had Interstate 8 here to take
10 it out, all this mineral.

11 I walked these mountains all the way through
12 all the time; walked them, slept in them; stayed there
13 for weeks at a time up in here, and come into Wellton or
14 Tacna or wherever, Yuma, to get supplies, and that is why
15 I know what I'm talking about, because the mineral
16 interested them. They wanted to put a plant in here. I
17 thought it would make more work in this area here, say,
18 for the copper industry down in Ajo and different places
19 and around here. It should help in some ways; then
20 should make some taxes for state and, naturally, the
21 federal government in these areas that there was several
22 minerals of value they wanted.

23 I cataloged 24 minerals myself. I am no
24 geologist. I am just a person. I have been around oil
25 and gas, and worked in the coal mines of our own at home

1 in order to get our coal out we need, and worked in
2 agriculture because we had farms. I have owned
3 construction equipment of different types and semitrucks.
4 So I know a lot. I trucked for the industrial areas in
5 steel and also appliances and that. So I have a little
6 knowledge of that end there, too, but while I worked in
7 the mountains there, I tried to preserve your areas so
8 that there would not be a big lawsuit on my part for the
9 work I done in there.

10 When we first went in there, we went in, a
11 group of businessmen in there, and opened up this land,
12 and they were interested in what they had to do to get
13 through this, and I told them we had to put in a plan of
14 intent.

15 So we went to the Yuma office and stayed there.
16 They went up, just like they was in the oil and gas
17 business, and stated what they was going to use it for,
18 and they asked: What are they going to use for, and they
19 said they were going to take in D-8s and whatnot, bigger
20 equipment. Right away the man -- Naturally, if I was in
21 the same predicament, if I was in his shoes, flew off the
22 handle. He said: Well it will be a \$1,000,000 bond to
23 start with, and so I expected it, the way they went in
24 and talked to them.

25 So we went down the hall, after we got our

1 maps, and looked at the area; explained what we were
2 going to do. I did government work back when, in
3 Colorado and other states there in the high mountains, as
4 high as -- close to 11,000 foot on roads and other work
5 for the benefit for industries and forestries and parks,
6 for cattle grazing and so on, access to the area.

7 And so after we talked it over awhile, then, I
8 wrote out a plan of intent there, and I figured out
9 that -- That was new to me at that time, for this state
10 here. I knew what it was in Colorado; there for certain
11 areas, and so he looked it over. He okayed it. Then he
12 dropped the bond, and we never had any trouble with the
13 BLM or anybody from that time on.

14 So I was satisfied there, but we have covered
15 that area. We had gone out with a vehicle. Usually we
16 run the washes in there as near as we could. I could see
17 where Patton's men had worked on their maneuvers across
18 that land; would still show up, but as long as you travel
19 the washes and that, and did not tear up too much --

20 Your BLM representative here at the time was
21 Lance was his first name. His last name is hard to
22 pronounce; you remember him, though, at that time, but we
23 got along good. I seen your helicopter and the Army
24 planes and helicopter would fly over. I knew they could
25 check the area; see what was going on, and I think they

1 were satisfied with that work so far, because when they
2 put the powerline across there, the area, through the
3 mountain range and across here to the power plant or the
4 nuclear plant, they used the same roads we built through
5 there. They improved them.

6 I was afraid at the time that I was cutting too
7 much. When they went in, they cut where they bring the
8 semis in, and trim the way they wanted to, that wide. So
9 I thought, well -- I felt a little better after they went
10 through and seen what they done.

11 When I worked at home, I had a man working for
12 me. I expected his tracks for the machine to be evened
13 out, no cuts. When you back off of a yard or industrial
14 lot, you grade it down to blacktop or whatever. A lot of
15 men had a habit of turning the machine around real quick
16 when they loaded it out. They did more damage than they
17 meant to do when they loaded it out. I seen that happen
18 in these mountains where the men was careless. I seen
19 other work done over the years and miners have done with
20 the equipment was good. I mean, they were careful. That
21 is one thing I do know in that area there. My people do
22 a lot of your work in this area, now, on Interstate 10,
23 on sewer, water and buildings and the proposed ag
24 construction company and some ag companies in there. I
25 forgot their names. It is under that.

5 - CONSULTATION AND COORDINATION

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1 So I have learned a lot through that other work
2 through there. So all I can say is we need this land
3 around that area as near as we can to develop for mining,
4 and hope that taxes will override what the wilderness
5 benefits would be, and they can themselves take care of
6 the land.

7 That is all I have to say.

8 MR. McCLURE: Thank you, Mr. Ackerman. Yes, sir.
9 Do you wish to speak?

10 MR. PFRIMMER: Yes.

11 MR. McCLURE: Sure.

12 MR. PFRIMMER: Paul Pfrimmer is my name. I am from
13 old Stantonville, the old ghost town of Stanton, 10 miles
14 east of Congress. I get my mail out of Congress. So it
15 is not quite so bad.

16 The one think I am interested in here is oil
17 and gas in Arizona. It is supposed to be a dry state,
18 but it isn't. I have found seven gushers plumb full of
19 oil, and I want to open up one this summer sometime if
20 things come through like I expect it, and this I think
21 all but one structure will rival the East Texas oilfield,
22 which is 10 miles wide and 40 miles long. That covers 40
23 sections.

24 Now, this big one, that is here in Arizona,
25 will cover 140 sections once we get started. That is a

1 lot of oil and natural gas; will cover 500 sections. It
2 is tremendous. That is all there is to it, and what I'm
3 worried about is: How much wilderness areas will cover
4 some of these places.

5 Now, I think I better quit. This is the first
6 time I ever got up before anybody.

7 MR. McCLURE: Thank you, Mr. Pfrimmer.

8 MR. PFRIMMER: I think I better sit down.

9 MR. McCLURE: Is there anyone else who wishes to
10 speak this evening? If not, I want to thank all of you
11 for attending. Your views will be part of the permanent
12 record, which will remain open for further statements or
13 letters until May 2nd, 1985.

14 Again, if you wish to write, you should address
15 your letter to the District Manager, Bureau of Land
16 Management, Phoenix District Office, 2015 West Deer
17 Valley Road, Phoenix, Arizona 85027.

18 This hearing is hereby closed.

19 (The hearing adjourned at approximately 7:45 p.m.)
20
21
22
23
24
25

1 I HEREBY CERTIFY that I was present at the public
2 hearing before the Bureau of Land Management in the
3 matter of the Lower Gila South Planning Area of the
4 Phoenix District; that I made a stenographic record of
5 all proceedings had and adduced before said Bureau upon
6 said hearing; and the foregoing 26 pages constitute a
7 full, true and accurate transcript of the same, all to
8 the best of my skill and ability.

9 DATED this 15th day of March, 1985.

10
11 
12

13 BONNIE SUMIDA
14 Court Reporter
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22
23
24
25



UNITED FOUR WHEEL DRIVE ASSOCIATIONS

of U.S. and CANADA

8900 N. Camino de Anza Tucson, AZ 85704

Mr. Marilyn V. Jones, District Manager
Bureau of Land Management Phoenix District - USDI
2015 N. Deer Valley Rd.
Phoenix, AZ 85027

Feb. 12, 1985

Dear Mr. Jones:

1-1

I have just completed a review of your "Lower Gila South Draft RMP & EIS". Although you apparently used sound professional judgement in many of your resource management decisions there are some decisions that illustrate a preponderance of political servitude. I am of course referring to your recommendations for "wilderness". You recommend "wilderness" in 4 WSA's (2-125, 2-128, 2-142/144 & 2-172) totalling more than 180,750 acres. These decisions do not reflect the same objectivity you displayed in evaluating the suitability of WSA's that you rejected from wilderness consideration. The same objective criteria that you used to find other WSA's as "unsuitable" exist in these 4 WSA's that you say are "suitable". Each of these WSA's has significant mineral/geothermal potential and many miles of "roads". Most of areas are severely intruded by "roads" and two of the units at least are absolutely bisected by roads while another is nearly bisected by a "cherrystemmed" "road".

In view of the recently enacted AZ Wilderness Act these 4 WSA's add little to the diversity of the existing NWPS. By your own admission "no new ecosystems would be added to the NWPS". So why are you even suggesting that these poor grade WSA's be considered for "wilderness"? Is it because you have been given some quota of wilderness to dream up? Is it political pressures demanding a minimum wilderness for BLM?

1-2

I believe these WSA's be left under multiple-use management. In this way the existing 93.55 miles of "vehicle ways" and 6 miles of "roads" could be utilized by a much larger segment of the public. You estimate that some "4650 visitor days/year of recreation use" will occur with "wilderness". From other BLM studies (Yuma Dist. Draft RMP/EIS 1985) vehicular recreational uses exceed 1.8 million visitor days/year. You indicate that wilderness recreation would relate to "\$17,763 annual expenditures". Whereas other vehicular recreational estimates indicate a gross revenue of some \$620 million (BLM 1985). Your own estimates indicate that "10,000 visitor days use within the WSA's now" and I assert that 90% of this is vehicular recreation from your admissions of 366.5 miles of "ways" and 7.35 miles of "roads". Your estimate of each "wilderness" visitor spending \$7.64/day may be accurate and your total value of "wilderness" recreation of \$17,763/year may be accurate. Tell I assure you that 10,000 vehicular recreationists will spend more than \$7.64/day, but even at that you have a value of over \$76,000.

Lastly, you seem to have gone to a great deal of effort to detail "wilderness" in this EIS and how multiple-use will be totally detrimental. If I didn't know better I could say you showed prejudice. We both know that with today's laws and regulations governing multiple-use your professional expertise would adequately protect any "unique" qualities these "wilderness areas" may possess.

Thank you for hearing me out. I hope my comments are taken as constructive criticism. If there are any questions, or I can be of any assistance please call on me at any time.

Sincerely,

Stan Benson

Stan Benson, Director Land-Use

CC: AZ Assoc. 4WD Clubs

Dean Ribbes, State Dir

RESPECT...PROTECT...AND ENJOY: LAND, WATER, MOUNTAINS, AND SUN RESOURCES

Response - Letter 1

1-1

The Bureau acted in accordance to law and established policy in recognizing the need for "cherrystemming" roads or other man-made features. Though the boundaries of a WSA containing "cherrySTEMS" may be irregular as a result of such corridors, Section 603(a) of FLPMA did not specify a particular shape for an area that may be recommended for wilderness designation.

1-2

Information contained in BLM's "Wilderness Public Opinion Survey" published October 1983 revealed that wilderness visitors spent an average of \$18.86 per person on wilderness trips lasting an average of 2.47 days. Thus, each person was found to spend an average of \$7.63 per 24 hour visitor day. On a 12 hour visitor day basis, expenditures would amount to \$3.81 per 12 hour visitor day which was rounded to \$4.00 per 12 hour visitor day in this EIS.

2

601 E. 10th St
Casa Grande, Az
85222

2/19/85

it's would like to see the Tabletop
mountain area designated a
wilderness reserve.

Christy Walton
William E. Dees

Casa Grande, Az
Casa Grande, Az

Rec'd 2/20/85

3

February 23, 1985

Mr. Marlyn V. Jones
District Manager, Bureau of Land Management
Phoenix District Office
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Re: The Lower Gila South Draft
Resource Management Plan

Dear Mr. Jones,

The acreage the BLM plans to recommend for designation as wilderness in the Lower Gila South Area is grossly inadequate. The BLM proposal would provide neither adequate recreation for Arizona's burgeoning population nor adequate habitat to protect the area's unique ecosystems. I most strongly urge you to adopt the Environmental Protection alternative, which would confer wilderness status to all 12 Wilderness Study Areas. At the very least, the 380,000 acres containing crucial desert bighorn and desert tortoise habitat should be granted wilderness status.

Before discussing the BLM recommendations for the individual Wilderness Study Areas, I would like to make several general points regarding the BLM draft.

1. During the next two decades, the population of Arizona's major metropolitan areas will double or triple. The areas protected by wilderness status must therefore be vastly increased if the state's residents are to be able to enjoy these desert lands in near-pristine conditions. Even now, the wilderness areas immediately accessible to residents of Phoenix and Tucson are overtaxed; the Superstition Wilderness, the Pusch Ridge Wilderness, and Saguaro National Monument are all overrun by hikers, except in the very worst weather. This excessive pressure both endangers the ecosystems involved and degrades the visitors' wilderness experience. Obviously, we need a great expansion of the wilderness system, and the BLM areas are particularly important in this regard because of their proximity to Phoenix, Tucson and Southern California. As a practical matter, most wilderness trips are taken on a day off or, at best, on a spare weekend, which is enough time to visit Lower Gila South wilderness areas but not enough time to visit, say, the Grand Canyon.

2. In the draft Resources Management Plan the BLM rejects wilderness status for most areas because "they do not have unique wilderness values" or "other wilderness areas are planned nearby." Such illogical arguments are a variation on the "If you've seen one tree, you've seen them all" philosophy and fail to address the basis issues at hand:

a) As noted by many sources, including the National Wildlife Federation, habitat loss is the greatest threat to American wildlife, and this is especially

Response - Letter 3

true in the fast-growing Southwest. Establishment of small, isolated preserves provides very little long term protection for the ecosystems and individual species. For instance, desert bighorns must have free access across bajadas and valleys separating individual mountain ranges in order to maintain diversity in the gene pool and protect against catastrophic destruction of individual populations (e.g. by disease). It is therefore critically important that large, near-contiguous areas have wilderness protection.

b) The recreational value of wilderness areas is critically dependent on the availability of sufficient wilderness areas and acreage to handle the people who wish to use them. The presence or absence of "unique features" is irrelevant when a visitor spends his whole trip falling over fellow hikers. Since solitude in a natural setting is the great benefit of a wilderness trip, it is again the size and availability of wilderness areas that counts.

3. The BLM recommends against wilderness status in several study areas because trains could occasionally be heard. That's silly. The East and West sections of Saguaro National Monument (both wilderness areas) are constantly being overflowed by commercial airliners approaching or leaving Tucson International Airport. Because of the aircraft, the wilderness experience is less than perfect, but it is infinitely better than no wilderness experience at all. Wilderness areas close to population centers, railways, and major highways will naturally tend to be affected by the sounds of civilization, but even so, these wilderness areas are by far the most important source of wilderness recreation to most people, since they can be visited frequently. My wife and I greatly value the week we spend each year in the Grand Canyon backcountry, but as a practical matter, we derive far more pleasure and relaxation from the Pusch Ridge and Saguaro National Monument wilderness areas, despite their less-than-pristine character, simply because we can visit them twice a week on spare afternoons.

4. In the proposed Resource Management Plan, the BLM frequently excludes from wilderness areas acreage which "may be difficult to manage because of . . . easy accessibility." Here the BLM is taking the wrong point of view: Having a wilderness area which is imperfectly protected is infinitely preferable to abandoning the area to long-term ecological disaster.

5. The BLM RMP consistently excludes bajadas and valleys from proposed wilderness areas, claiming that they do not offer the recreational opportunities that mountains do, on the assumption that "rugged topography" is an intrinsic virtue. Such a view is extremely shortsighted. The bajadas and valleys are ecologically interesting in their own right and provide tremendous recreational opportunities for hikers, bird and animal watchers, and photography buffs who want to spend a few leisurely hours amid the wonders of the Sonoran Desert. Older persons and those with limited physical capacity can easily enjoy such areas.

Bajada and valley areas also allow hikers to find solitude easily, even during heavy visitor use, since one can wander up a wash or across country. In the mountains, on the other hand, off-trail travel is difficult and tends to cause erosion and damage to vegetation.

3-1

BLM's Wilderness Study Policy states that an area must be capable of being effectively managed to preserve its wilderness character. Only those areas which can be managed as wilderness over the long term will be recommended as wilderness. Areas with easy ORV access and a lack of natural or man-made barriers will be difficult to manage as wilderness over the long term.

3-2

Large portions of WSA's with desert bajada and valleys have been recommended as suitable for wilderness in the Proposed Action. Large acreages of this desert landform are found in the Eagletail Mountains, Woolsey Peak and Tabletop Mountains WSAs.

6. In the proposed RMP, some areas are deprived of wilderness designation because of potential mineral deposits. That is unjustified. All of the wilderness study areas in the Lower Gila South area combined constitute less than one percent of the land area of Arizona, so closing these areas to mining or other development certainly would cause no significant economic loss. The recreation and habitat protection which would be provided by wilderness designation are vastly more important.

Comments on the BLM's Proposed Action for each of the individual Wilderness Study Areas follow.

New Water Mountains: The Proposed Action would only protect two-thirds of the WSA's crucial bighorn habitat, even though "This WSA has the highest bighorn density of the 12 WSAs studied" (p. 130). The area also provides outstanding hiking and backpacking opportunities and is contiguous with the proposed Kofa Wilderness. The entire New Water Mountains WSA should be protected as wilderness.

Little Horn Mountains West: The entire WSA is crucial bighorn sheep habitat and should be given wilderness protection, especially since it is contiguous with the much larger Little Horn Mountains WSA.

Little Horn Mountains: The BLM itself notes that this WSA offers outstanding opportunities for both solitude and primitive recreation, contains strikingly scenic geologic features, and is a major bighorn use area. I therefore find incomprehensible the BLM's recommendation against wilderness designation. The entire 90,430 acres should be protected as wilderness.

Eagletail Mountains: The BLM's Proposed Action would return 46,835 acres to multiple use to "improve manageability." Forget manageability -- imperfectly protected wilderness is vastly preferable to no protection at all. The entire WSA should be recommended for wilderness status.

East Clanton Hills: The BLM's Proposed Action recommends against protection for the WSA because of alleged mining potential and because the southern portion of the WSA is not mountainous and therefore lacks "primitive recreational opportunities." I thoroughly disagree, and the BLM's own data contradict their assessment of this area. In Table S-4 of the RMP, the potential for mineral development in this area is described as "low." The potential economic benefits of development are therefore inconsequential, while wilderness designation for the area would protect crucial desert bighorn and tortoise habitat and provide outstanding wilderness recreation. The BLM's assertion that valleys and bajadas aren't worth protecting is wrong. As I noted earlier, unspoiled bajadas and valleys provide tremendous recreational opportunities, and at least part of the BLM resource staff apparently agrees: "The (Hyder) valley's vegetation, desert swales, and numerous washes provide excellent screening. In addition, the size of this expansive plain provides the hiker with a sense of total seclusion" (p. 140). That's just the right kind of place for a leisurely hike in the desert. It should be protected as wilderness.

3-3

The EIS stated that the most outstanding primitive recreation opportunities found in the WSA's northern half

3-3

Face Mountain: The BLM justifies the Proposed Action with the statement that "the opportunity for solitude alone does not justify" wilderness status. I disagree. Solitude is the primary goal of most wilderness visitors, and the Face Mountain WSA provides it in abundance. In addition, visitor access is good and "visitor use concentrations are unlikely" (p. 142). Since the WSA includes no significant potential mineral deposits, no existing or pending rights-of-way, and no great grazing conflict, the best use of the area would be realized by granting it wilderness protection.

Signal Mountains: The BLM concedes that this WSA meets all wilderness criteria, provides outstanding solitude and primitive recreational opportunities, and contains crucial bighorn and tortoise habitat. Furthermore, wilderness designation would cause no significant mining or livestock grazing conflicts. The BLM's refusal to recommend wilderness status is therefore completely incomprehensible. The arguments provided by the BLM for their multiple-use recommendation are all either specious or inconsequential, as noted below (all quotes from p. 108):

a) "All (wilderness characteristics) are found to an equal ... degree in other Lower Gila South WSAs recommended for designation. . . Wildlife habitat for desert tortoise and desert bighorn also occur in more abundance in other WSAs." Totally irrelevant. Both the recreational enjoyment of wilderness visitors and the survival of bighorn and tortoise populations are critically dependent on the amount of acreage devoted to wilderness, as noted earlier. The paucity of acreage recommended by the BLM for wilderness status is inadequate to meet the recreational needs of Arizona's growing population and will guarantee the demise of bighorn and tortoise populations isolated by development and habitat degradation.

b) "Moreover, solitude is frequently disrupted by the noise of numerous trains along the WSA's northwest border." This statement conflicts with the BLM's own statement (p. 145) that "Solitude opportunities are occasionally disrupted by the sounds of passing trains." It also demonstrates the absence of any reasonable justification for the BLM's proposed action.

Signal Mountain would be an outstanding addition to the nation's wilderness system and should certainly be recommended for wilderness status.

Woolsey Peak: The entire WSA should be given wilderness protection. The 12,930 acre eastern border which the BLM recommends for multiple use should be included in the wilderness area, if only as a buffer zone to protect against adverse impacts from development of the private lands to the east.

North Maricopa Mountains: This WSA richly deserves wilderness designation. It offers outstanding opportunities for solitude, hiking, backpacking, and wildlife observations within a short distance of Arizona's major metropolitan areas. In addition, wilderness status would protect 40,000 acres of crucial desert bighorn and desert tortoise habitat. The BLM's argument that this WSA would be difficult to manage as wilderness is unconvincing: As noted earlier, imperfect protection is a vast improvement over no protection. Even with no active enforcement, wilderness designation alone can have a salutary effect toward environmental protection.

South Maricopa Mountains: This area should certainly be given wilderness status. This WSA provides outstanding recreational opportunities close to the state's major metropolitan areas. Furthermore, it contains 42,800 acres of crucial bighorn and tortoise habitat. The contention in the Proposed Alternative that appreciable "mineral potential" is present is wrong. In table S-4 both "Mineral Potential" and "Mineral Development Potential" for this WSA are rated as "low," and on p. 151 it is noted that "there are no known mineral occurrences of economic proportions in the WSA." Apparently, the BLM recommendation against wilderness status is simply based on a feeling among the officials in charge that "the NWPS has 609,667 acres of land with similar characteristics already designated, and 1.3 million acres of similar lands administratively endorsed as wilderness," and that should be enough. Such reasoning is clearly false, as noted earlier. Further wilderness areas are required both to provide recreational opportunities for Arizona's growing population and to protect the remaining undamaged Sonoran Desert ecosystems in southern Arizona.

In the Proposed Alternative it is also contended that "Much of the WSA is relatively flat bajada offering little to the primitive recreationist." That is totally wrong. As I noted above, the South Maricopa bajadas can offer tremendous recreational opportunities, and this is confirmed on p. 151 of the RMP/EIS: "Opportunities for hiking are found in densely vegetated flatter areas as well as on the more difficult, rocky mountain slopes . . . The topographic relief found in the WSA provides the backpacker, horseman and photographer with a variety of places to explore with a minimal chance of encountering others."

Butterfield Stage Memorial: This WSA, which is essentially contiguous with the North Maricopa and South Maricopa WSAs, should be given wilderness status to provide continuity between the two larger WSAs. This would increase the value of all three areas to the indigenous bighorn and tortoise populations and would increase recreational opportunities for backpackers. Since this WSA has a low potential for minerals, no record of mineral production, no inholdings, no proposed utility corridors, and no significant rangeland developments, wilderness designation would cause absolutely no adverse impacts.

In summary, I strongly urge that all 12 WSAs be recommended by the BLM for wilderness designation. Protection of these last unspoiled tracts of Sonoran desert would ensure continued hiking, camping, and "nature-watching" opportunities for Arizona's growing population while providing a chance of survival for the unique species inhabiting these areas. No significant negative economic impact would result from such wilderness designation, as demonstrated by the tables in the RMP/EIS. On the other hand, releasing these areas for development would inevitably result in the destruction of many of the most beautiful and awesome areas of the desert southwest.

Sincerely,



Dr. Paul Hintzen
5750 Camino Esplendor #237
Tucson, Arizona 85718

4

March 4, 1985
 P.O. Box 6
 Aguila, Arizona 85520

District Manager,
 Bureau of Land Management
 Phoenix, District Office
 2015 W. Deer Valley Rd.
 Phoenix, Arizona 85027

Dear Sir:

I believe all of this land should stay Multiple use.

Here's Why:

As a Taxpayer, who used to live in the Desert (25 years R 15 W T 1 S) who pumped or pulled water by hand for the Wildlife (thats not there since you people closed the wells down) Bighorn Sheep, in the Hot dry spells came to our well to drink. Deer came right up to the House if the tank was empty, to get a drink!

Birds were all over! Snakes & Gila Monsters came to drink!

Now you can go out there, (I was last May;) there were NO Deer, no Dove, no Bighorn, no Snakes or Gila Monsters, just two or three Birds.

If you are wondering who I am, I'm Sandra Hovatter, We Built Hovatter road, Maintained it by hand, when the grader didn't make it. Also I have a Father and a Sister buried out there, and I want to be able to go see their graves!

So I think this Country should be open to the people. I like space as much or more than anybody. But have you looked at a State Map lately? You have State land, National Parks, State Parks, National Game Ranges, Military Ranges, Indian lands, so when you get through that doesn't leave much land to just go out and do your thing on!

So MULTIPLE USE IT SHOULD BE !!!

Sincerely

Sandra J. Moore
 Sandra L. Moore - Formerly Sandra L. Hovatter

5

3-4-85
PO Box 6
AGUILA, AZ
85320

DISTRICT MANAGER
BUREAU OF LAND MANAGEMENT

DEAR SIR,

I AM OPPOSED TO THE CONFISCATION
OF ANY MORE LAND FROM THE PUBLIC
DOMAIN FOR WILDERNESS AREAS. YOUR
EXCUSES FOR DENYING THE GOOD HOYAH
CITIZENS ENTRY ARE DEPLORABLE AND
WEAK. WHEN YOU GET THROUGH WITH
BOTTLYING PEOPLE UP IN THEIR HOUSES
YOU WILL HAVE COMPLETELY REGIMENTED
THEM. DICTATORSHIP-INEVITABLY FOLLOWS.

PROVIDED YOU ACCOMPLISH THE
ABOVE (PRESUMED) GOAL, EVEN THOUGH
YOU MAY NOT BE AT PRESENT AWARE
OF WHAT YOU ARE REALLY DOING, I
MUST TELL YOU THIS. FOR THOSE OF
YOU FORTY YEARS OF AGE, YOU
WILL LIVE TO SEE THE DAY THAT YOU
WILL BE THE ONE TO REMEMBER OR THE

ONE WHO WILL BE REMEMBERED (MULTIPLE USE
THINK ABOUT IT. PLEASE.)

SINCERELY YOURS,

James M. Brown
PO Box 6
Aguila, AZ 85320

6

Aguila, Ariz
March 5, 1985

District Manager
Bureau of Land Management
Phoenix District Office
2015 W Deer Valley Rd.
Phoenix, Ariz

Dear Sir,

I wish to state that I do not
approve of all the Area Around Ariz
being put under a wilderness Area!
As a Native American I know
we already have many foris, Indian
reservations - etc - I do believe a certain
Amount should be set aside but not
so much in any one Area. also I
cannot see what multiple use hurts
the Land if properly supervised. It
is really a help to the native game
& Birds to have the cattle men in the
Area - because of the water. Of course
I believe the Ranchers should have to
maintain a base well or more than

they enjoy & they should have
respect for the game of the area.

Thank You Sincerely
Julia Maxwell
Box 202
Flagstaff, Ariz
85320

P.O. Box 164
Aguila,
Arizona
March 4, 1985.

D COORDINATION

District Manager
Bureau of Land Management,
Phoenix District Office,
2015 W Deer Valley Rd.,
Phoenix, Arizona 85027.

Dear Sir:

Re your plans to place much of our desert-
land seizure - into Wilderness Areas:

His Public Domain now, and should so re-
main!

I lived out in the desert - the southwest side
of the highest peak of the Littlehorn Mountains,
42 miles from our nearest neighbors - for 25 years.
We hiked miles around, learned to know the
desert and its denizens. Still came outting out
there. We are part of the desert. I enjoy its
beauty, peace and serenity.

My first daughter and husband are buried
there. Naturally, I like to go out to "commune"

with them and on to the graves. If your present plans go through, I could no longer do so.

There are now Indian lands, preserves of all kinds, parks, game refuges, military ranges, etc., which is fine. But you don't need Wilderness Areas! Your plans are to keep "us the people" cooped up consistently, and not be permitted to go out in the relaxing desert away from noise, confusion, traffic pollution and farm pollution - dust, chemical drift etc. - so we can breathe fresh pure air.

"Please! Do not do this to us! It is evidence of the rankest discrimination against "us the people"!

Yours truly,
(Mrs) Barbara C. Horvath

8

March 7, 1985

RECEIVED

BLM, PHOENIX DIST. OFF.
PHOENIX, ARIZONA

MAR 11 1985
AM 7:18 PM 9:10 11:12 1:23 4:45 6

District Manager
Bureau of Land Management
2015 W. Deer Valley Rd.
Phoenix, Arizona 85027

Dear Sir,

I have studied your RMP/EIS for the Lower Gila South Planning Area, and would like these comments to be included in the official record for this EIS.

It is obvious that these public lands are within a day's drive of the major cities of Phoenix and Tucson. A large and growing number of the residents of these cities are demanding wilderness type experiences to balance the stresses of big city living.

The traditional users of public lands have been the mining and livestock industries. They have left our lands overgrazed and scarred, with severely damaged wildlife and water resources. Thankfully, these industries are now on the wane in Arizona, and it would be foolish to subsidize them further with the No Action and Resource Production alternatives in this EIS.

I believe the only acceptable alternatives are

2

the Resource Protection and Environmental Protection alternatives. My recommendation is the Environmental Protection alternative because I feel that the majority of the present and future residents of this state want their public lands managed for their wilderness values.

As a matter of fact, to back up this statement, please refer to a recent survey by the University of Arizona which shows that Arizonans by a wide margin regard maintenance of wildlife and recreation values as highest priorities for public land management programs. (article in Landscape Architecture, November-December 1984, by Dr. Erwin Zube and Charles Law, School of Renewable Natural Resources, U of A).

To sum up, I strongly recommend for the Lower Gila South management area the adoption of the Environmental Protection alternative, calling for the wilderness protection of 12 WSA's totalling 607,557 acres. As a second alternative, I would support the Resource Protection plan.

Sincerely,
James E. Posedly
P.O. Box 411
Oracle, AZ 85623

9

BLM PHOENIX DISTRICT

MAR 12 '85

6 516 W. Fillmore
Phoenix, Arizona 85043

March 11, 1985

DM _____
ADM _____
PA _____
ADMIN _____
OPS _____
MINS _____
RES _____
P&EA _____
PRA _____
LGRA _____
KRA _____
CF _____
Action By _____
Due Date _____

District Manager
Bureau of Land Management
Phoenix District Office
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Dear Sir:

I wish to comment on the proposed "conversion" of public, or multiple-use, lands into wilderness areas.

First, let me state that I spent eighteen years of my life living out in the desert, with our nearest neighbors being 42 miles away. Hence, I know firsthand of what I write.

The Wilderness Act as originally written would prohibit most, if not all, of this land being declared wilderness. Most areas have roads, mining, etc., in them; what is left is too small an acreage. Has the law been "reinterpreted" to allow this theft of our lands?

This state already has much land withdrawn into State Land, Wilderness, Refuges, Parks, and Preserves of all types. Why should what little is left be effectively taken from the people? Nearly all of this land is inaccessible by any means except the automobile; how is anyone going to be able to enjoy the serenity, the beauty, of the desert, if this land is stolen through being illegally seized as wilderness?

I thought our government was "by the people, for the people." How is this either by or for the people? Please, PLEASE do not allow this to happen!

Most Sincerely,

Jean Speer
Jean Speer (Hovatter)

Hickabury Co 8535
3/14/85

To B.L.M.

I don't think you need
any more wilderness land.

I am a miner and my mind
is my income. If you take in
my mind into wilderness you
can put me on your welfare
lines and take care of me.
The miners have water out at
all times. ~~that~~ the Arizona Miners
will not hurt the animals.

And we miners want to
be left alone.

Thank You

Violet Ryan

Box 1786

Hickabury Co 8535

21

MARCH 17, 1985

DISTRICT MANAGER
B. L. M.
PHOENIX DISTRICT OFFICE
2015 W. DEER VALLEY RD.
PHOENIX, ARIZONA, 85027

DEAR SIR,

I WOULD LIKE TO RESPOND TO THE PROPOSED CONVERSION OF PUBLIC & MULTIPLE USE LANDS INTO WILDERNESS AREAS. HAVING AN INTEREST IN MINING, HIKING, HUNTING, GEOLOGICAL EXPLORATION & HISTORY I AM TOTALLY AGAINST "WILDERNESS AREAS" IF THOMAS JEFFERSON HAD LISTENED TO THE PEOPLE WHO WANTED THE "WILDERNESS" OF THE LOUISIANA PURCHASE LEFT ALONE WE WOULDN'T HAVE PART OF THIS COUNTRY. ALASKA WOULDN'T BE HERE IN THE U.S.A. ~~THE~~ GA MUCH OF THE WEST WOULDN'T BE SETTLED IF PEOPLE HADN'T BEEN ALLOWED TO GO WHERE THEY WANTED, WHEN THEY WANTED, HOW THEY WANTED. TOO MUCH LAND IS ALREADY DENIED ACCESS TO IN THE FORM OF CURRENT WILDERNESS AREAS, PARKS, MILITARY GUNNARY RANGES, PRIVATE LAND, ETC. LEAVE WHAT'S LEFT TO THOSE WHO HAVE EARNEST DESIRE TO EXPLORE, HUNT, MINE OR USE AS THEY SEE BEST.

SINCERELY,

Kenneth F. Spear
KENNETH F. SPEAR
6516 W. Fillmore

6516 W. Fillmore
PHOENIX, ARIZONA 85043

24

March 21, 1985

Phoenix District BLM
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Dear Sirs:

We need more Wilderness areas in Western United States, especially in Arizona where the population is growing at a fantastic rate.

I support wilderness recommendations for:

White Canyon	Mt. Wilson	Coyote Mountains
Picacho Mountains	Baboquivari Peak	Hells Canyon
Little Horn Mountains	North Maricopa Mountains	
Eagle Tail Mountains	Signal Mountain	South Maricopa Mountains
Woolsey Peak	Tabletop Mountain	

Thank you very much,

Robert J. Schmidli
Robert J. Schmidli
6220 S. 8th Place
Phoenix, Arizona 85040

28

ARIZONA



OFFICE
OF THE
GOVERNOR
BRUCE BABBITT

OFFICE OF
ECONOMIC PLANNING AND DEVELOPMENT

Beth S. Jarman, Ph.D., Executive Director • (602) 255-5371

RECEIVED

B.L.M. PHOENIX DIST. OFF.
PHOENIX, ARIZONA

MAR 25 1985
7:18 AM

MEMORANDUM

TO: Bureau of Land Management, Phoenix District Office

FROM: Arizona State Clearinghouse

DATE: March 22, 1985

RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE LOWER GILA SOUTH RESOURCE MANAGEMENT PLAN - RMP/EIS
SAI NO: AZ 85-80-0011

This memorandum is in response to the above project submitted to the Arizona State Clearinghouse for review.

The project has been reviewed pursuant to the Executive Order 12372 by certain Arizona State officials and Regional Councils of Government.

The Standard Form 424 is attached along with any comments that were received for submission with the project.

Attachments

cc: Arizona State Clearinghouse
Applicant

Executive Tower 4th Floor • 1700 West Washington • Phoenix, Arizona 85007

~~SIGNOFF~~

EXHIBIT A 67

OMB Approval No. 0948-0008

FEDERAL ASSISTANCE		2. APPLICANT'S APPLICATION IDENTIFIER	3. STATE APPLICATION IDENTIFIER	4. NUMBER	5. DATE
1. TYPE OF SUBMISSION (Mark appropriate box) <input type="checkbox"/> NOTICE OF INTENT (OPTIONAL) <input type="checkbox"/> PREAPPLICATION <input type="checkbox"/> APPLICATION		6. NUMBER RMP/EIS	7. DATE Year month day	8. NUMBER 85-80-0011	9. DATE ASSIGNED Year month day
4. LEGAL APPLICANT/RECIPIENT a. Applicant Name Bureau of Land Management b. Organization Unit Phoenix District Office c. Street/P.O. Box 2015 West Deer Valley Road d. City Phoenix e. State Arizona f. Contact Person (Name & Telephone No.) Bill Carter, (602) 863-4464		5. EMPLOYER IDENTIFICATION NUMBER (EIN) a. NUMBER 151-6196 b. TITLE DOI/BLM		10. ESTIMATED NUMBER OF PERSONS BENEFITING a. Area of Project Impact (Name of state, counties, cities, etc.) Lower Gila South Resource Management Plan - This draft EIS describes and analyzes five alternatives for managing the public lands in the Lower Gila South RMP/EIS area.	
7. TITLE OF APPLICANT'S PROJECT (Use section IV of this form to provide a summary description of the project.) DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE LOWER GILA SOUTH RESOURCE MANAGEMENT PLAN - This draft EIS describes and analyzes five alternatives for managing the public lands in the Lower Gila South RMP/EIS area.		8. TYPE OF APPLICANT/RECIPIENT a. State b. Federal c. Local d. Other e. Other f. Other g. Other h. Other i. Other j. Other k. Other l. Other m. Other n. Other o. Other p. Other q. Other r. Other s. Other t. Other u. Other v. Other w. Other x. Other y. Other z. Other		11. TYPE OF ASSISTANCE a. Federal b. State c. Local d. Other e. Other f. Other g. Other h. Other i. Other j. Other k. Other l. Other m. Other n. Other o. Other p. Other q. Other r. Other s. Other t. Other u. Other v. Other w. Other x. Other y. Other z. Other	
12. PROPOSED FUNDING a. FEDERAL \$.00 b. APPLICANT \$.00 c. STATE \$.00 d. LOCAL \$.00 e. OTHER \$.00 f. Total \$.00		13. CONGRESSIONAL DISTRICTS OF: a. APPLICANT b. PROJECT c. PROJECT START DATE Year month day d. PROJECT DURATION Months e. DATE DUE TO FEDERAL AGENCY Year month day		14. TYPE OF APPLICATION a. New b. Renewal c. Extension d. Other e. Other f. Other g. Other h. Other i. Other j. Other k. Other l. Other m. Other n. Other o. Other p. Other q. Other r. Other s. Other t. Other u. Other v. Other w. Other x. Other y. Other z. Other	
19. FEDERAL AGENCY TO RECEIVE REQUEST Bureau of Land Management a. ORGANIZATIONAL UNIT (IF APPROPRIATE) Phoenix District Office b. ADMINISTRATIVE CONTACT (IF KNOWN) Bill Carter c. ADDRESS 2015 West Deer Valley Road Phoenix, Arizona 85027		20. EXISTING FEDERAL GRANT IDENTIFICATION NUMBER		21. REMARKS ADDED Yes No	
22. THE APPLICANT CERTIFIES THAT: a. YES, THIS NOTICE OF INTENT/PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 FOR REVIEW ON DATE b. NO, PROGRAM IS NOT COVERED BY E.O. 12372 OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW		23. CERTIFYING REPRESENTATIVE a. TYPED NAME AND TITLE b. SIGNATURE		24. APPLICATION RECEIVED 19	
25. FEDERAL APPLICATION IDENTIFICATION NUMBER		26. FEDERAL GRANT IDENTIFICATION		27. ACTION TAKEN a. AWARDED b. REJECTED c. RETURNED FOR AMENDMENT d. RETURNED FOR E.O. 12372 SUBMISSION BY APPLICANT TO STATE e. DEFERRED f. WITHDRAWN	
28. FUNDING a. FEDERAL \$.00 b. APPLICANT \$.00 c. STATE \$.00 d. LOCAL \$.00 e. OTHER \$.00 f. TOTAL \$.00		29. ACTION DATE Year month day		30. STARTING DATE Year month day	
31. CONTACT FOR ADDITIONAL INFORMATION (Name and telephone number)		32. ENDING DATE Year month day		33. REMARKS ADDED Yes No	

NSN 7540-01-008-6162
PREVIOUS EDITION
IS NOT USABLE

424-100

STANDARD FORM 424 PAGE 1 (Rev. 4-84)
Prescribed by OMB Circular A-102

COMMENTS AND RESPONSES



ARIZONA DEPARTMENT OF TRANSPORTATION

HIGHWAYS DIVISION

206 South Seventeenth Avenue Phoenix, Arizona 85007

BRUCE BABBITT
Governor
WILLIAM A. ORDWAY
Director

February 28, 1985

CHARLES L. MILLER
State Engineer

Ms. Louise Fehr
Arizona State Clearinghouse
1700 West Washington Street
Room 505
Phoenix, Arizona 85007

Re: Bureau of Land Management
Lower Gila South Resource
Management Plan/
Environmental Impact Statement
Phoenix District, Arizona - Draft
(SAI#85-80-0011)

Dear Ms. Fehr:

Please find attached the completed State Clearinghouse comment form on the referenced document. The Arizona Department of Transportation has preliminarily reviewed this RMP/EIS and plans to attend the March 12, 1985, public hearing in Phoenix.

The Bureau of Land Management's proposed action does not appear to affect existing ADOT Maintenance and Five-Year Construction Programs. The four Wilderness Study Areas, New Water Mountains, Eagletail Mountains, Woolsey Peak, and Table Top Mountains proposed for designation appear to have boundaries sufficiently removed from existing highways so as to not affect possible future roadway widenings or realignments. ADOT does have long range concerns regarding proposed land disposal of parcels along the State Highway routes and designating utility corridors following highway alignments.

Following the public hearing, ADOT will provide detailed written comments to the Bureau of Land Management.

Very truly yours,

Philip A. Shucet
PHILIP A. SHUCET, Manager
Environmental Planning Services

PAS:MRD:eh

Enclosure

cc: Bob Darr, TPD



Comment Form To Be Completed by Reviewing Agency

TO:

State Application Identifier (SAI)

FEB 08 1985

State AZ No 85-80-0011

Robert J. Darr
Advanced Planning Section
Department of Transportation
206 S. 17th Ave., Room 310B
Phoenix, AZ 85007

Transportation
Mineral Res.
Game & Fish
Ag. & Hort.
Health
Water
Parks
Land

Region I, II, IV, V

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

☐ No comment on this project ☐ Proposal is supported as written ☒ Comments as indicated below

1. Is project consistent with your agency goals and objectives? ☒ Yes ☐ No ☐ Not Relative to this agency
2. Does project contribute to statewide and/or areawide goals and objectives of which you are familiar? ☒ Yes ☐ No
3. Is there overlap or duplication with other state agency or local responsibilities and/or goals and objectives? ☒ Yes ☐ No
4. Will project have an adverse effect on existing programs with your agency or within project impact area? ☐ Yes ☒ No
(See attached letter)
5. Does project violate any rules or regulations of your agency? ☐ Yes ☒ No
6. Does project adequately address the intended effects on target population? ☒ Yes ☐ No
7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☒ Yes ☐ No

Additional Comments (Use back of sheet, if necessary):

Reviewers Signature

Philip A. Shucet

Date 2/28/85

Title

Manager, Environmental Planning Services

Telephone 255-7767

TO:

Director
Agriculture & Horticulture Dept.
421 Capitol Annex West
Phoenix, AZ 85007

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

State Application Identifier (SAI)
FEB 06 1985
State AZ No 85-80-0011

Transportation
Mineral Res.
Game & Fish
Ag. & Hort.
Health
Water
Parks
Land

Region I, II, IV, V

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

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5. Does project violate any rules or regulations of your agency? ☐ Yes ☐ No
6. Does project adequately address the intended effects on target population? ☐ Yes ☐ No
7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary):

*BEM continues to work with the Commission on all Protected Natural
Plants ARS-3-901-90 - See Page 20 statement - Protection Status*

Reviewers Signature R. A. Canty, Jr.

Date 2-12-85

Title Director, Western Region

Telephone 255-4373



ARIZONA
STATE
PARKS

1688 WEST ADAMS STREET
PHOENIX, ARIZONA 85007
TELEPHONE 602-255-4174

BRUCE BABBITT
GOVERNOR

STATE PARKS
BOARD MEMBERS

PRISCILLA ROBINSON
CHAIR
TUCSON

GWEN ROBINSON
VICE CHAIR
YUMA

REESE G. WOODLING
SECRETARY
TUCSON

ELIZABETH A. DRAKE
PHOENIX

DUANE MILLER
SEDONA

RAY MOLERA
NOGALES

ROBERT K. LANE
STATE LAND COMMISSIONER

MICHAEL A. RAMNES
DIRECTOR

ROLAND H. SHARER
DEPUTY DIRECTOR

February 8, 1985

Mr. Marlyn V. Jones.
District Manager
Bureau of Land Management
Phoenix District Office
2015 W. Deer Valley Road
Phoenix, AZ 85022

Lower Gila South Planning Area
Re: Draft Resource Management Plan
and EIS
DOI-BLM

Dear Mr. Jones:

I have reviewed the draft report submitted for the above project. The report appears to consider adequately the cultural resources of the project area at this stage of investigation. Pursuant to 36 CFR, Part 800 of the Advisory Council's regulations ("Protection of Historic and Cultural Properties"), we look forward to continuing the consultation process regarding the cultural resources of this project.

We appreciate your cooperation with this office in complying with the historic preservation requirements for federal undertakings. If you have any questions about any of this, please contact me at (602) 255-4174.

Sincerely,

Teresa L. Hoffman
Teresa L. Hoffman
Archaeologist

for Donna J. Schober
State Historic Preservation Officer

TLH:rmj

COMMENTS AND RESPONSES

29

Comment Form To Be Completed by Reviewing Agency

TO:

State Application Identifier (SAI)

FEB 06 1985

State AZ No 85-80-0011

SHPO
Arizona State Parks Board
1688 W. Adams, Rm. 109
Phoenix, AZ 85007

Transportation
Mineral Res.
Game & Fish
Ag. & Hort.
Health
Water
Parks
Land

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

Region I, II, IV, V

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

☐ No comment on this project☐ Proposal is supported as written☒ Comments as indicated ^{on back} ~~below~~

1. Is project consistent with your agency goals and objectives? ☐ Yes ☐ No ☐ Not Relative to this agency
2. Does project contribute to statewide and/or areawide goals and objectives of which you are familiar? ☐ Yes ☐ No
3. Is there overlap or duplication with other state agency or local responsibilities and/or goals and objectives? ☐ Yes ☐ No
4. Will project have an adverse effect on existing programs with your agency or within project impact area? ☐ Yes ☐ No
5. Does project violate any rules or regulations of your agency? ☐ Yes ☐ No
6. Does project adequately address the intended effects on target population? ☐ Yes ☐ No
7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary):

Reviewers Signature

Jenna J. Hoffman
Archaeologist

for Donna Scholze
SHPO

Date

2-12-85

Title

Telephone

255-4174

3/22
I am writing to you
to plead with you to
protect our wilderness
in Arizona.

One special area to me
is Gila (Lower) South. It's
very beautiful there and it
is an important habitat
for bighorn sheep and the desert
tortoise.

Please help to preserve
this wilderness.

Sincerely,

Shelley Berlin
4540 E. Broadway #11
Phoenix, AZ 85008

CUTLERY WORLD
Colonnade Mall
Phoenix, AZ 85016
274-6900

RECEIVED
BIRMINGHAM, ALA.
FEB 22 1985
AM

30

E. Anderson.
7671 E. Tanque Verde Rd.
Tucson, AZ. 85715

3/18/85

Dear Sirs,

I would like to comment on the Lower Gila RMP-EIS. This area has been used for mining and agricultural purposes since Arizona joined the United States. The idea that this is suitable for wilderness is a little hard toathom. I feel if there are certain plant and animal species in this area that need protection then measures can be taken to restrict certain uses within various parts of this region, rather than closing the entire thing off. The overwhelming majority of Americans are dedicated hikers and back packers.

Sincerely,



31

R. F. Alexander
725 S. Abrego Dr.
Green Valley, AZ 85614
March 13, 1985

Re: Lower Gila RMP-EIS

Gentlemen:

I am opposed to wilderness designation for any of the WSA's covered in the Lower Gila South report. These parcels have been used for years for mining and agricultural activities and will serve the future better by continuing management as multiple-use areas.

Sincerely,

Richard Alexander

RECEIVED
MAR 22 1985
BHOENIX, ARIZONA
BGM, BHOENIX DIST. OFF.

32

March 21, 1905

Phoenix District BLM
2015 W. Deer Valley Road
Phoenix, AZ 05021

The designation of wilderness can be our gift to future generations.
I support wilderness recommendations for the following:

PHOENIX DRAFT RIS

White Canyon should be included because of its unique beauty.

Mt. Wilson provides crucial habitat for bighorn sheep and is surrounded by lands on three sides already proposed for wilderness in the Lake Mead Recreational Area. It has important wilderness characteristics.

Coyote Mountains. This natural area not only fulfills all the important wilderness characteristics, but also has 7 special status wildlife species and 6 protected plant species.

Baboquivari Peak. This area has broad public support, the peak is sacred to the Papago Indians, it has outstanding natural qualities, and contains an abundance of wildlife. You plan to acquire state land to the east to enlarge this unit. We approve your recommendation of the entire WSA as wilderness.

We hope you will also include Hell's Canyon and the Picacho Mountains in your wilderness recommendations.

LOWER GILA SOUTH DRAFT RIS

Little Horn Mountains/Little Horn Mountains West. These two areas contain remarkable volcanic features and two deep canyons. Little Horn West is contiguous to the Kora National Wildlife Refuge area. These two areas form important habitat for both bighorn sheep and desert tortoise.

Signal Mountain. This rugged area should be included in spite of the threat of mineral development.

North Maricopa Mountains/Butterfield Stage Memorial. These areas contain crucial habitat for bighorn sheep and desert tortoise, and also an abundance of prehistoric cultural sites. The areas are threatened by off-road vehicles, especially in riparian washes.

We also would like you to include the following areas in your wilderness recommendations: Tabletop Mountains, Woolsey Peak, New Water Mountains, Eagletail Mountains, East Clanton Hills, Pace Mountain, and South Maricopa Mountains.

Thank you for your consideration in these matters.

Sincerely,

Janice O. Loepke
3401 E. River Road
Tucson, AZ 85718

RECEIVED

33

Dear Sirs,

I am writing this letter to voice my support for wilderness designations for the White Canyon, Mt. Wilson, Coyote Mtns, Baboquivari Peak, Hell's Canyon, and the Pecos Mtns. Also I support wilderness status for the Little Horn Mtns, Little Horn Mtns-West, Signal Mtn, North Maricopa Mtns, Butterfield Stage Memorial, Tabletop Mtns, Woolsey Peak, New Water Mtns, Eagletail Mtns, East Clanton Hills, Pace Mountain, and the South Maricopa Mtns.

Thank You,

Don Ayers E.I.T.

RECEIVED
MARCH 22 1905

35

Phoenix District BLM
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Dear Reader:

I am writing in support of wilderness recommendations for the following areas which I understand you have not included in your proposed recommendations:

White Canyon
Mt. Wilson
Coyote Mountains
Babopuivari Peak
Little Horn Mountains
Little Horn Mountains / West
Signal Mountain
North Maricopa Mountains / Butterfield Stage Memorial

I have personally been in the White Canyon, Little Horn Mountains and North Maricopa Mountains / Butterfield Stage Memorial areas and feel it would be a real tragedy if these areas are not included. We are not creating any more potential wilderness areas. They will be gone and gone in time given as and it is imperative that we preserve these areas while we still have the opportunity. Please include all of the above areas in your recommendations.

Sincerely,
Frank S. Loulan
Frank S. Loulan

928 E. Cavalier Dr.
Phoenix, AZ 85014
March 21, 1985

37

March 22, 1985

Phoenix District
Bureau of Land Management
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Dear Sir:

It has just come to my attention that the Bureau of Land Management has released its recommendations for wilderness designation for certain areas in Arizona, and that public comment on these is being solicited.

I am a native of Arizona and have lived here for most of my 65 years. The changes during that period, especially the pressures of population growth, have been tremendous. With that in mind I urge you to include not only very large areas for wilderness designation such as the Little Horn Mountains, North and South Maricopa Mountains, Woolsey Peak, Eagletail Mountains, but also smaller areas like White Canyon, Coyote Mountain, and Babopuivari Peak (this should also include 3245 acres of state land that should be acquired by trade), and Signal Mountains.

Since population is exploding with no end in sight, we must act now to preserve as much wildlife habitat, scenic areas, and recreational opportunities as we possibly can. Possible potential for copper production, oil and gas leases (not producing) should not stand in the way of protecting Arizona's unique wild areas. Off road vehicles and grazing should be strictly controlled so that these beautiful areas are not destroyed for the pleasure or profit of a few.

Yours truly,

Allian Longley
Allian Longley
1729 W. State
Phoenix, Arizona 85021

COMMENTS AND RESPONSES

38

Dr. Walter A. McGleneghan
8512 East Virginia Avenue
Scottsdale, Arizona 85257

March 22, 1985.

Phoenix District BLM,
2015 W. Deer Valley Rd.,
Phoenix, AZ 85027

Dear Sirs:

Having read the Environmental Impact Statements on areas in the Phoenix District authority, I am amazed and chagrined to find that your office -- or, at least, the BLM -- is recommending against 6 out of the 7 be denied Wilderness classification. I am writing to urge that all of these specific areas BE INCLUDED in favorable recommendation.

I refer to those designated as: WHITE CANYON, Mt. Wilson, Coyote Mountains, Baboquivari Peak, Lower Gila South, including Little Horn Mountains and Little Horn Mountains West, Signal Mountain, and the North Maricopa Mountains.

Having lived in Arizona from 1936 to 1939 and continuously from 1955 to the present, I know something of the areas under consideration. While I am now of an age where I cannot get out and enjoy those places in person I surely believe that they should be kept from being commercialized and/or despoiled. Their commercial development would soon run out and leave only despoiled areas. Their preservation can bring joy and love of nature for generations to come.

I strongly urge your favorable action on each and all of them.

Yours for the future of Arizona,

Walter A. McGleneghan

Dr. Walter A. McGleneghan

Walter A. McGleneghan
8512 East Virginia Avenue
Scottsdale, Arizona 85257

Walter A. McGleneghan

39

Tucson
General
Hospital

YOUR COMMUNITY OBSTETRIC HOSPITAL
JOHN T. WINTER, D.O.

3/22/85

Dear Sir,

I am writing to add my
support for wilderness recommendations
for:



Northwest
Emergency
Center

1601 West 1st Road
Tucson, Arizona 85704
602-742-1101

Phoenix EIS (White Canyon, Mt. Wilson, Coyote Mtns;
Baboquivari Peak, Hell's Canyon and Pinal Mountains).

Lower Gila South EIS (Little Horn Mtns and Mtns West,
Signal Mtn, North Maricopa Mountains and Deerfield Stage Memorial
Tabletop Mtns, Woolsey Peak, New White Mtns, Eagle's MTs,
East Clinton Hills, Fox Mtn, S. Maricopa Mtns).

The Baboquivari Peak Wilderness (one of my favorite
hiking spots) should also include the 3,245 acres of
contiguous state land.

Thank you. Help protect our wilderness

John Winter

40

Michael L. Wunder
1919 E. Libra
Tempe, Ariz 85283

Phoenix District BLM
2015 W. Deer Valley Rd
Phoenix, Az 85027

Dear Sirs:

I am writing to state my support for areas which are not presently wilderness, but which have been reviewed by your department. I have particular interests in these areas and feel that each has features that make it unique and valuable and would like to see them finally reach wilderness designation. Please consider the following for wilderness designation.

1) White Canyon - although small this area is close to Phoenix for weekend trips and its canyons and slick rock areas transport hikers out of their everyday lives and into another time. This area is a quick refresher for working adults.

2) Coyote Mountains

3) Baboquiviri Peaks

4) Signal Mountain

5) North Maricopa Mountains - This area's size, terrain, and need to be protected from off-road vehicle damage and intrusion make it a prime candidate for wilderness inclusion.

I appreciate the opportunity to make my recommendations known, and hope that you will seriously consider them.

Sincerely,

Michael L. Wunder

RECEIVED
BLM PHOENIX DIST OFF
APR 22 1982
MAY 2 1982
APR 22 1982

COMMENTS AND RESPONSES

41

William S. Finkelstein
 401 E. Lawton St.
 Tucson, Az 85704
 March 23, 1985

2

U.S.D.I Bureau of
 Land Management
 Phoenix District
 2015 W. Deer Valley Road
 Phoenix, Az 85027

To Whom It May Concern:

This letter is in response to the request for comments on the Phoenix and Lower Gila South Environmental Impact Statements concerning wilderness recommendations for Bureau land in Arizona. I am concerned that the Bureau has only seen fit to recommend wilderness status for such limited acreage in Southern Arizona. The growing population and development of the state means growing impact on its wildlands.

My concern is not for recreational areas, though this is important. I am concerned about the impact on the decreasing wildlife habitat and with the protection of watersheds. Since the Bureau is now mandated with the responsibilities of multiple-use management it is important that it take a holistic approach to its resource management. Wilderness management is an important component of this. Because of this I support the inclusion of the White Canyon, Mt. Wilson, Coyote Mountains, Little Horn Mountains and Little Horn Mountains West, Signal Mountain and the North Maricopa Mountains and Butterfield Stage Memorial into the U.S. Wilderness System.

I also support the expansion of the proposed Baboquivari Peak wilderness area by the acquisition of state land.

Decisions made now will have a very important far-reaching effect. I hope your decisions concerning these proposed wilderness areas will be the first steps toward responsible wilderness management for the Bureau.

Sincerely,
 William S. Finkelstein

RECEIVED

43

5121 N. 12th Ave
Phoenix, Az. 85013
March 24, 1985

Planning District S/LM
2015 W. Deer Valley Rd.
Phoenix, Az. 85027

Gentlemen:

This is to indicate my support for the wilderness recommendations for the Phoenix EIS. I definitely feel the White Canyon should be included, as well as Mt Wilson and Coyote Mountains. The Baboquivere Peak Wilderness would be greatly enhanced by the addition of the contiguous state of 245 acres.

Because of its nearness to the Kofa Refuge, why can't the Little Horn Mountains be included?

I would also like to see the Signal Mountains and North Maricopa Mountains/Butterfield Stage Memorial added.

These rich wildlife areas are threatened and need to be preserved. To act now is imperative. Once these lands are lost, a heritage of wilderness is gone forever!

Very truly yours,

Russ Marie King
(Mrs. C. B. King)

45

District Manager
BLM, Phoenix District Office
Phoenix, AZ 85027

23.03.85.

Subject: Comments about the Draft RMP/EIS for Lower Gila South.

Summary conclusion: I support the No Action Alternative

45-1

Comments: Your Planning Team is biased in favor of wilderness-type recreation to an unbalanced degree. Their Proposed Action recommends a whopping 189,750 acres for wilderness and at the same time do not designate or propose to manage a single acre for intense use ORV area. On page 1 you just dismiss and brush aside the whole special ORV high use or a designation issue with a single sentence: "No areas have been identified in the RMP/EI area for ORV designation." The Planning Team does not even bother to give any rationale in support of this negative statement. Other BLM Districts have in their Draft RMP's designated some acreage for high use ORV play areas. Why not Phoenix District? Suitability for wilderness recreation is discussed in great detail. This does not come as surprise since the Phoenix District Outdoor Planners have not published any ORV recreation promoting pamphlets in the past, only ones promoting other types of recreation.

Your report mentions the ORV-related visitor days/year losses that will occur in areas you recommend for wilderness designation (p.137 for example) but without any planning effort to designate where these displaced ORV recreationists will be sent. Despite that BLM recognizes ORV recreation as a matter of policy the Planning Team has adopted a sort of "get lost" attitude towards the ORV recreationist in their Draft RMP.

Also significant is the absence from the Draft an ORV Management Plan and Map. Could this omission be caused by lack of specific first hand expertise in ORV recreational activities among your Planning Team members?

Sincerely,

Harry Melts
Harry Melts
Box 64
Portland, ID 83853

Response - Letter 45

45-1

ORV high use area designation was not identified as an issue in the RMP. However, we will address site specific needs for ORV designation on a case by case basis. Please refer to Chapter 1, Planning Process Overview, pages 1 and 2, Lower Gila South Draft RMP/EIS. In addition, see Chapter 2, page 21 and 22, Recreation Program.

COMMENTS AND RESPONSES

47

Phoenix District BLM
2015 W. Deer Valley Rd.
Phoenix, AZ. 85027

3/23/85
Box 675
Bisbee, AZ.
85603

Dear Sirs:

I am writing, out of deep concern over below named wilderness areas in Arizona which are threatened and must be preserved for all of our well being:

White Canyon - copper production is immaterial compared to our need to preserve wild lands, small tho the area may be.

Ht. Wilson - This area is known for its outstanding scenic value as well as providing excellent opportunities for solitude (a vanishing resource these days) and provides a crucial habitat for Bighorn Sheep.

Coyote Mts. - Smallness in size is an oversight to consider when you take into consideration the many benefits of these mts. - eg. - 76 special status wildlife species, 8 protected plant species, 250 culturally sensitive acres containing a classic period Hohokan Indian compound.

Saboguirani Peak - I strongly recommend the entire WSA as wilderness - this is a popular hiking & climbing area, a sacred peak to the Papago Indians, an abundance of wildlife proliferates, with outstanding natural qualities.

In addition I feel it is essential to preserve Heck Canyon & the Picacho Mts., Little Horn Mts., Signal Mts. & N. Haricops Mts.

I urge you to strongly consider these requests. Lee

must never forget the eternal value of wilderness which was so long in the making & can be so quickly destroyed and lost forever.

Maintenance of natural lands are essential to the survival of man.

Thank you.

Sincerely,

Sara Traum

SARA TRAUM

50

March 25, 1985

Phoenix District BLM
2015 W. Deer Valley Road
Phoenix, AZ 85027

Dear BLM:

We are presently observing and photographing the wildlife and scenery in the vicinity of Signal Mountain and Woolsey Mountain, consisting of 19,640 acres.

It would be devastating to the bighorn sheep, not to mention the various other species of wildlife and plantlife, if this land is not preserved.

Please continue to protect our beautiful wilderness, not only in the above-mentioned area, but also in the following areas:

- White Canyon
- Mt. Wilson
- Coyote Mountains
- Baboquivari Peak
- Hell's Canyon
- Picacho Mountains

(over)

pg. 2

It will prove to be a far more valuable resource than any minerals that may be discovered in those areas, if the wildlife and wilderness ~~are~~^{are} left untouched.

Thank you.

Sincerely,

Deanne M. Zahale
Naturalist

Joseph T. Zahale III
naturalist photographer
Melissa B. Zahale

COMMENTS AND RESPONSES

51

2407 N. Palomino Court
Chandler, Arizona 85224
March 23, 1985

Phoenix District Bureau of Land Management
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Dear Sir:

I support wilderness recommendations for the Phoenix EIS and the Lower Gila South EIS.

I am particularly interested in the Baboquivari Peak wilderness study area and support acquisition of the adjacent state land for wilderness designation.

It is important to me that as much wilderness area in Arizona as possible be preserved.

Thank you.

Sincerely,

Dorothy Lees Riddle

Dorothy Lees Riddle

54

Gentlepeople, My wife, Julie Hey, and I both strongly support wilderness recommendations:

1. White Canyon - South of Tucson - 6,968 acres.
2. Mt. Wilson area - This area is a home for bighorn sheep, 24,821.
3. Coyote Mtns. - 5,080 acres.
4. Baboquivari Peak - Great place for a hike 2,065 acres.
5. Little Horn Mountains - 90,430 acres.
6. Signal Mountain - 19,640 acres.
7. North Maricopa Mountain - Butterfield Stage Memorial.

We are Tempe residents who enjoy the beauty & solitude of the Sonoran desert. Designating this area as wilderness will make/keep our state the wonderful place it is. Please act on these recommendations.

Sincerely,
Jim Marley
Julie Hey

56

3/20/85

L. H. Chatham
1322 S. Camino Del Sol
Green Valley, AZ 85614

Dear Sirs

We urge you to recommend
for wilderness designation
the following areas: White
Canyon, Coyote Mountains,
Babogquivari Peak, Mt Wilson,
Little Horn Mountains & Little
Horn Mountains West & North
Maricopa Mountains.

We are fairly new Arizona
residents but deeply concerned
for the preservation of wilderness
areas & wildlife habitats.

Sincerely

Mr & Mrs L. H. Chatham
1322 S Camino Del Sol
Green Valley AZ 85614

57

MR. RICHARD FAITH
4502 NO. CAMINITO ESTE
TUCSON AZ 85718

Phoenix District BLM
2015 W. Deer Valley Rd.
Phoenix, Az. 85027

Dear Sirs:

Please accept my support for the
protection of the following -

White Canyon	<u>Babogquivari Peak</u>
Mt. Wilson	Hells Canyon
Coyote Mountains	Picacho Mtn.
Little Horn Mountain	Woolsey Peak
Signal, Mountains	New Water Mtn.
North Maricopa Mountain	Eagle Dail Mtn.
Tabletop Mtn.	East Chantun Hills
	Face Mountain
	South Maricopa Mtn.

Thank you, Richard Faith

58

2/24

DEAR BLM,

I AM WRITING TO EXPRESS MY STRONG SUPPORT FOR WILDERNESS AREAS BEING DESIGNATED TO THE FOLLOWING AREAS:

PHOENIX EIS

WHITE CANYON	PICACHO MOUNTAINS
MT WILSON	COYOTE MOUNTAINS
HELL'S CANYON	PARDOLIVARI PEAK

LOWER GILA SOUTH EIS

TABLETOP MOUNTAINS	EACE MOUNTAINS
SIGNAL MOUNTAIN	EAGLETAIL MOUNTAINS
N. MARICOPA MTS/POTTERFIELD STAGE	WOOLSEY PEAK
LITTLE HORN MOUNTAINS/LITTLE H. W.	NEW WATER MOUNTAINS
SOUTH MARICOPA MOUNTAINS	EAST CLANTON HILL

ARIZONA WILDERNESS SHOULD BE PRESERVED ~~AND NOT DESTROYED~~ FOR SOLIDARITY PURPOSES AND TO PROTECT WILDLIFE. ALLOWING COMMERCIAL DEVELOPMENT OF THESE AREAS WOULD BE A BIG MISTAKE.

SINCERELY,

Carr Klein

CARROLL KLEIN

6702 N. 11 AVE.

PHOENIX, AZ 85013

RECEIVED
FEB 24 1985
BLM

59

PRE EIS
JUL 2 RMP/EIS

P.O. Box 613
Cave Creek
AZ. 85331
March 25, 1985

Phoenix District BLM

We are glad to learn that the BLM plans to acquire 3,245 acres of state land which will enlarge the proposed Baboquivari Peak wilderness area.

We wish to support wilderness status for the WSA's of MT. Wilson, the Coyote Mountains, White Mountain, Little Horn Mountains and Little Horn Mountains West, the N. Maricopa Mountains, Butterfield Stage Memorial, and Signal Mountain.

Each of these areas, as you know, has many unique features which qualify it for wilderness protection. We do encourage you to make such recommendations.

2.

With the rapidly expanding population in Arizona, and the enormous increase in the use of destructive off-road vehicles in recent years, it is important to act before it is too late. Our wilderness areas are one of the most valuable legacies we can leave to future generations.

Yours sincerely,

Flynn C. & Jeanne Kelly

Phoenix District BLM
2015 W. Deer Valley
Phoenix, AZ.
85027

Dear Sirs:

The purpose of this letter¹⁵ is to voice our support for the following wilderness recommendations

White Canyon
Mt. Wilson
Coyote Mountains
Babquivari Peak
Hell's Canyon
Picacho Mountains
Little Horn Mts
Signal Mt.
North Maricopa Mts.

Tabletop Mts
Woolsey Peak
New Water Mts.
Eagletail Mts.
East Clanton Hills
Face Mt.
South Maricopa Mt.
Butterfield Stage
Little Horn Mts. West

Thank You

Eddie Bennett
Karen M. Bennett

30-230¹⁵ SAC
FLAG, AZ, 86001

62

3/25/85

To whom it may concern,

DARA & SCOTT SAMUELS
2007 N. FORGEUS
TUCSON, ARIZONA 85716

I am writing to you in
support of wilderness recommendations

for the following areas:

White Canyon (6,968 acres), Mt Wilson
(24,821 acres), Coyote Mountain (5,080 acres),

Papagoquiveri Peak (2,065 acres, + 3,245
acres of contiguous state land
that should be acquired by trade)

Hells Canyon (9,379 acres), Picacho

Mtns (6,400 acres), Little Horn
Mountains (3 west), Signal Mtn,

North Maricopa Mtn, Butterfield Stage
Memorial, Tabletop Mtns, Woolsey Peak,
New Water Mtns, Eagle Tail Mtns,
East Clenden Hills, Face MT.,

and South Maricopa Mountains

These areas are a spectacular
part of the Sonoran desert and
must be preserved,

Thank you for your time.

Dara Newman-Samuels

STERLING VINSON, Photography

Construction
News • Sports
Archaeology

1940 East 2nd Street
Tucson, Arizona 85719
(602) 326-8583

27 March 1985

Phoenix District, BLM
2015 W. Deer Valley Road
Phoenix, AZ 85027

Gentlemen:

I am writing as a concerned member of the Sierra Club in response to their letter to members of 18 March.

I wish to draw your particular attention to Baboquivari Peak, now a Wilderness Study Area, with further land acquisition planned by you, and to the Picacho Mountains. Since I am a resident of Tucson, these areas are especially important to me, because they offer me a chance to get into the wilderness on weekends. There I can get a bit of peace and quiet and can refresh my spirit through contact with the natural world. For Baboquivari Peak, I hope that you do acquire the additional 3,245 acres of land east of the Wilderness Study Area. As for the Picacho Mountain area, this is a zone nationally known for its desert wildflowers and also has important historical significance as the site of Arizona's only battle of the Civil War.

Both areas deserve protection in and of themselves and the citizens of Tucson deserve these bits of nearby wilderness.

Thanking you, I remain

Sincerely yours,

Sterling Vinson
Sterling Vinson

3434 W. Sandalwood Dr.
Tucson, AZ 85745
April 1, 1985

Phoenix District BLM
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Dear Sir,

I am writing to be included in public comment on additional wilderness designations in Arizona. I particularly support the additions for Baboquivari Peak and the Picacho Mountains. I have visited both of these areas and can understand their potential as areas for preservation of the plant and animal life as well as the natural terrain.

Other areas being considered. I have not visited but am well aware of the need for wilderness designation of as many areas as possible in order not to lose the incalculable value of the flora and fauna we have in Arizona.

Sincerely,

(Mrs.) Peggie Vincent

85

415 So. Eastbourne Ave.
Tucson, Arizona 85716
March 29, 1985

Phoenix District BLM
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Gentlemen:

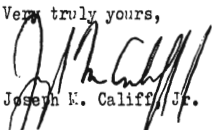
I am writing to comment on the draft EIS for wilderness study areas in the Phoenix district.

I wish to strongly support the allocation of large areas for wilderness designation. More particularly, the following areas:

White Canyon - 6,968 acres
Mt. Wilson - 24,821 acres
Coyote Mountains - 5,686 acres
Baboquivari Peak - 2,065 acres
Picacho Mountains - 6,400 acres

Your consideration of this recommendation is appreciated.

Very truly yours,


Joseph E. Califf, Jr.

87

Good morning?

I am strongly in favor of establishing

BLM wilderness areas at White Canyon, Mt.

Wilson, Baboquivari Peak, Coyote Mountain, and elsewhere. Arizona NEEDS protected wilderness areas

and Now is the time to set areas aside for protection — Now, before population pressures, mining, real estate developments, and other problems make wilderness designation impossible.

We lost Glen Canyon, we lost the once beautiful Phoenix valley, we lost the whole East Coast.

Let's not postpone the protection of plenty of wilderness areas in Arizona — while we still have the time, and while they are still wild.

Bob Wirth

P.O. Box 3228

E Flagstaff AZ 86003

88

blue moon photography

HERB McREYNOLDS



Phoenix District BLM
2015 W. Deer Valley Rd.
Phoenix, Arizona 85027

To Whom it May Concern:

This letter is in support of wilderness recommendations
for the following:

White Canyon
Mt. Wilson
Coyote Mountains
Baboquivari Peak
Hell's Canyon
Picacho Mountain

Sincerely,

Herb McReynolds

Herb McReynolds
550 Blackbird Roost, #4
Flagstaff, AZ 86001

91

1220 W. Las Lomas
Tucson, Arizona 85704
2 April 1985

Phoenix District BLM
2015 W. Deer Valley Road
Phoenix, AZ 85027

Re: Phoenix Wilderness EIS

Gentlemen:

I have been out of the city and unable to forward my statement concerning the above mentioned EIS and trust I may still be included with the group that has offered their support.

This is to advise that I support for wilderness designation the following:

1. #2-01A, Mt. Wilson, 24,821 acres.
 2. #2-187, White Canyon, 6,968 acres.
 3. #2-119, Hell's Canyon, 9,379 acres.
 4. #2-202, Coyote Mountains, 5,080 acres.
 5. #2-203B, Baboquivari Peak, 2,065 acres.
- A. I likewise recommend the acquiring of additional 3,245 acres of state land that is east of the WSA to enlarge the size of this small unit and give added protection to same.

I also support full wilderness status for all of the areas in the Lower Gila South EIS.

Sincerely,

Gene I. Wendt

GIW/mb

92

744 E. St.
 Thatcher, AZ 85552
 April 3, 1985

Phoenix District Bureau of Land
 Management
 2015 W. Deer Valley Rd.
 Phoenix, Arizona 85027

Gentlemen:

I would like to express my support for the wilderness designation of the following areas: White Canyon, Mt. Wilson, Coyote Mountain, Baboquivari Peak, Hell's Canyon and the Picacho Mountains.

The natural habitat of these areas represents a valuable resource to Arizona. Some are immediately adjacent to already protected land or areas for which protection is proposed. The Baboquivari Peak area is also important for religious and cultural reasons to the Papago Tribe. Although some of these areas are small, the wildlife habitat provided by them is an important consideration.

Thank you for your attention.

Yours truly,
 Melinda Wilson Lee.

93

April 3-1985
 MARLYN JONES DIST MGR
 PHX DIST BLM 2015 W DEER VALLEY RD.
 Phoenix AZ 85348
 Re. Lower Gila South. WSFS
 Does Not Meet The Criteria
 of Wilderness Act.

2. Multiple Use - Mining
 Cattle Raising - Winter Visitors

3. To Follow them - would cause
 Economic disaster to our area
 Merchants - motels, miners a the
 whole way of life - Cattle men

George W. Campbell Sr
 PO Box 301
 Salome AZ 85348

93-1

Response - Letter 93

93-1

The economic impacts of each of the alternatives chosen for study were identified in the draft RMP/EIS on pages 66-69, 75-77, 81-82, and 86-87. No significant impacts to the economy of the Economic Study Area are anticipated from any of the alternatives analyzed in the RMP/EIS.

98



United States
Department of
Agriculture

Forest
Service

Region 3

517 Gold Avenue, SW
Albuquerque, NM 87102

Reply To: 1920

Date: APR 03 1985

Marilyn V. Jones, District Manager
Bureau of Land Management
Phoenix District Office
2015 W. Deer Valley Rd.
Phoenix, Arizona 85027

Dear Ms. Jones:

The Southwestern Region has reviewed the draft EIS for the Resource Management Plan on the Lower Gila South Area. The Plan is not in conflict with management of National Forest lands, and we have no comments.

Sincerely,

for *Marlin D. Hughes*
JAMES C. OVERBAY
Deputy Regional Forester

RECEIVED
BUREAU OF LAND MANAGEMENT
PHOENIX DISTRICT OFFICE
APR 03 1985

FS-6200-28(7-82)

102

Greater Arizona Bicycling Association



P.O. BOX 3132

TEMPE, AZ 85281

(602) 277-8718

APRIL 4, 1985

LOWER GILA SOUTH
RMP/EIS
BUREAU OF LAND MANAGEMENT

DEAR BILL CARTER,

AS PRESIDENT OF GREATER ARIZONA BICYCLING ASSOCIATION, PHOENIX CHAPTER, I'M WRITING TO YOU IN THE INTERESTS OF OUR MEMBERS.

WE WOULD LIKE TO SEE BICYCLES (ALL-TERRAIN OR MOUNTAIN BICYCLES IN ADDITION TO REGULAR BICYCLES) BE ALLOWED TO CONTINUE TO USE EXISTING ROADS AND TRAILS IN THE LOWER GILA SOUTH WILDERNESS STUDY AREAS. THESE VEHICLES DO NOT POLLUTE NOR DO THEY MAKE LOUD NOISES TO SCARE WILD LIFE.

WE RECENTLY HAD A LARGE TOUR IN ONE OF THE PRIMITIVE DESERT AREAS OF THE STATE AND REALLY ENJOYED THE BEAUTY OF THE AREA. FROM THE EXISTING PAVED ROAD. NO MATERIAL (PAPERS) OR DEBRIS (ALUM. CANS) WAS LEFT TO SPOIL THE ENVIRONMENT.

IT WILL BE FORTUNATE IF OTHER CONSIDERATE BICYCLISTS CAN EXPERIENCE ADDITIONAL FUTURE TOURS.

SINCERELY,

FRANCES CHUBINSKI
PRES. G.A.B.A. PHOENIX

Response - 102

102-1

Any activity that is considered nonimpairing to the existing wilderness characteristics of a Wilderness Study Area is allowed.

COMMENTS AND RESPONSES



105

BOB STUMP
3d DISTRICT, ARIZONA

211 CANNON BUILDING
WASHINGTON, DC 20515
(202) 225-4576

DISTRICT OFFICE
5001 FEDERAL BUILDING
PHOENIX, AZ 85025
(602) 281-6923

Congress of the United States
House of Representatives
Washington, DC 20515

ARMED SERVICES COMMITTEE

PERMANENT SELECT
COMMITTEE ON INTELLIGENCE

VETERANS' AFFAIRS
COMMITTEE

April 4, 1985

Marlyn Jones
Director Manager
BLM Phoenix District
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Dear Marlyn:

Enclosed please find a copy of a letter from Mr. and Mrs. W.H. Douglass concerning wilderness in the Lower Gila South. Would appreciate your including their comments in the public record on the proposal.

Best wishes.

Sincerely,


BOB STUMP
Member of Congress

BS:ll
Enclosure

700 Box 1100
Imperial, Az.
85346
3-30-85

US Congressman, Bob Stump

Dear Sir:

We are writing in opposition to the bill to be introduced ~~into~~ Congress making the Lower Gila South or New Valley Area of B.L.M. land into a Wilderness Area. This is near Imperial. It would then be restricted to all vehicles.

We feel this is not fair to disabled and Senior Citizens who are not able to walk long distances over rough, but beautiful terrain. They should not be deprived of the beauty of nature just because they can't walk, but should be able to drive on roads through such places.

"We are not thinking just of Snow Birds" who come from other states in the winter but older residents of the state who have always enjoyed getting out in the desert mountains, too.

So, please vote to keep these areas open to the public with instructions to conserve and protect nature, leaving it as it is.

Yours truly,
Mr. & Mrs. W.H. Douglass

5 - CONSULTATION AND COORDINATION

106

555 N Pantano Rd, #228
April 8, 1985

Phoenix District BLM
2015 Deer Valley Rd.
Phoenix, Az, 85027

Gentlemen:

When commercial interests such as mining and oil and gas extraction overshadow cultural and historic values, our country is going down the tube. Our grandchildren, yours and mine will have nothing left to be proud of. When we go to foreign countries, we see buildings and preserved ruins that are thousands of years old. The Indian artifacts in this country are fast disappearing, as are primitive areas which so well describe our geological heritage. The White Canyon area and Little Horn Mts/Little Horn Mts West are such areas, and should be preserved.

I urge the BLM to acquire these areas for posterity.

Sincerely yours

Constance Reed
Constance Reed

108

*Mr. Lindemann
2901 N. Forgeus
Tucson, Az. 85716*

Dear friends,

Areas which are kept in natural and pristine states are much needed. They ensure places where people can get away from the hassle and hassle of city life and also the more used tourist spots. Being new (relatively) to Arizona I have not had the chance, yet, to hike any of your proposed ^{wilderness} areas. But from information attained from friends and other sources I feel some worthwhile areas which are being proposed for wilderness designation are not being recommended by your office. More specifically I mean White Canyon, Mt. Wilson, and the Coyote Mountains from the Phoenix Draft EIS, and the Little Horn Mountains, Signal Mountain, and North Maricopa Mountains ~~from~~ from the Lower Gila South Draft EIS. As the population of Arizona and surrounding states grows more and more pressure will be put on state lands. Now is the time to ensure that they are kept in the most natural state as possible for our present enjoyment and future generations.

Thank You
Rick Lindemann

Wickenburg Gem + Mineral Soc.
P.O. Box 2461
Wickenburg, Az. 85358

At the Wickenburg Az. Gem
and Mineral Society, just to the closing of
the 1955 season. The mountain and
valley the first of the Lower
Silica Wilderness South.

Address: Wickenburg, Az. 85358
Helen V. Dudley Box 822 Wickenburg Az. 85358

Richard B. Binsley Box 722 Wickenburg Az. 85358
Clare M. Wilson HMC

Netty Manner P.O. Box 1152 " " "

Al Manner " " " " "

Erma M. Roe P.O. Box 459 Congress, Az. 85352

Al H. Roe " " "

Katharine Davis Star Rt. Box 11A Maricopa Az. 85342

Virgil F. Davis " " " " "

Grace Davis P.O. Box 1702 Wickenburg Az. 85358

Bertha Mear P.O. Box 2058 " 85358 "

Don Mear P.O. Box 2058 " 85358 "

Don Pumphrey P.O. Box 2377 Wickenburg Az. 85358

Etha Pumphrey P.O. Box 2377 Wickenburg Az. 85358

Raymond Raymond Meyer P.O. Box 1417 Wickenburg Az. 85358

Margaret Meyer P.O. Box 1417 Wickenburg Az. 85358

James E. Middleton Box 1925, Wickenburg Az. 85358

Ann Middleton, Box 1925, Wickenburg Az. 85358

Doris Boyles Box 20878 Wickenburg Az. 85358

Billy W. Boyles Box 20878 Wickenburg Az. 85358

Leona Bernus - P.O. Box 2461 Wickenburg Az. 85358

Dorothy Bernus P.O. Box 2461 " " "

Mary Ellen Hays P.O. Box 1329 Wickenburg Az. 85358

John H. Collins P.O. Box 306 Wickenburg Az. 85358

Ethel Collins " " " "

Erlyn Randall Box 2554 Wickenburg Az. 85358

Alfred Randall " " " "

Rena Perkins Star Rt. Maricopa Az. 85342

Leona Bernus, Sec.

116

Honeywell

HONEYWELL INFORMATION SYSTEMS INC.
P.O. BOX 8000
PHOENIX, ARIZONA 85066
2-24

April 8, 1985

Mr. Marlyn V. Jones, District Manager
Bureau of Land Management
Phoenix District Office
2015 W. Deer Valley Road
Phoenix, AZ 85027

Dear Sir:

It is my understanding that on March 12, 1985, BLM held a Public Hearing on Public Lands, specifically the Lower Gila South District. I do not have complete information on the agenda specifics but apparently the question of wilderness status of the area was debated.

It has been brought to my attention that a member of the public testifying at the hearing may have represented himself as speaking for the Honeywell Hikers, a private employee club of Honeywell, Inc. in Phoenix, Arizona. The Honeywell Hikers normally do not take sides on public issues although some members are deeply involved, as private individuals, on both conservation and recreational issues.

No one from the Honeywell Hikers club was authorized to represent the club at the March 12th BLM hearing. It would be appreciated if this position could be attached to the public record of that meeting.

Please let me know if I can be of any assistance or if you need more clarification on this matter.



Sven Hedin, President
Honeywell Hikers

SH/cg

cc: B. Holaday
Honeywell, Inc.
P. O. Box 8000 M.S. 268
Phoenix, AZ 85066

HONEYWELL INFORMATION SYSTEMS INC., P. O. BOX 8000, PHOENIX, ARIZONA 85066, TELEPHONE 602/862-8000

124

RECEIVED

BLM, PHOENIX DIST. OFF.
PHOENIX, ARIZONA

APR 15 1985

AM 7 8 9 10 11 12 1 2 3 4 5 6 PM

BUREAU OF LAND MGR.
PHOENIX DISTRICT OFFICE
2015 W. DEER VALLEY RD.
PHOENIX, AZ 85027

APRIL 9-85

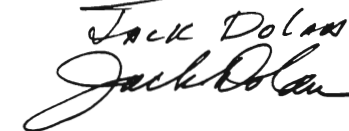
REF., LOWER GILA SOUTH

Please do NOT CHANGE THIS AREA
LEAVE AS MULTIPLE USE.

I WILL BE CLOSELY MONITORING THIS.

I HAVE SOME MINING CLAIMS IN THIS
AREA BUT EVEN IF I DID NOT I
WOULD BE AGAINST ANY WILDERNESS
AREA SINCE THIS IS DISCRIMINATORY
USE OF PUBLIC LANDS.

SINCERELY,



J. Dolan
5954 W. INDIAN SCHOOL #2069
Phoenix, AZ. 85031

131

March 28, 1985

Mr. D. Dean Bibles,
State Director
U.S. Dept. of the Interior
Phoenix District BLM
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Dear Mr. Bibles,

I understand that your agency is currently considering wilderness designation for some areas in Arizona. I would like to comment on your recommendations. I would appreciate your consideration of these comments before final designations are made.

In your recommendation you say that the White Canyon area is small and has "moderately favorable" potential for copper production. Given the well known troubles in our domestic copper industry I don't think moderately favorable potential warrants the destruction of part or all of even a small area of what remains of the wilderness in this country.

Since three sides of the Mt. Wilson area adjoin the Lake Mead National Recreation Area and given the needed habitat for wildlife such as the bighorn sheep it seems this area is ideally suited for designation. You say the area doesn't have "important" wilderness areas unique to the area. Are we only to preserve areas as unusual as Yosemite or the Grand Canyon? With the little that remains, all wilderness areas are unique.

The Coyote Mountains area is also called too small. The area contains some important archeological areas and great natural beauty. Who would recommend that we raze Mt. Vernon or Monticello simply because they cover small areas?

I believe you have recommended wilderness designation for the Baboquivari Peak area. I strongly concur. While there are many justifications for the designation, one of the most important is the religious significance to Papago Indians.

The two Little Horn Mountain areas should also be designated as wilderness areas. They adjoin the Eagletail Mountains area you propose to designate and the wildlife in the area already have enough threats to their survival without shrinking their living area.

Signal Mountain also adjoins an area currently designated. For all the good reasons I've already mentioned it should be added. Does new mineral exploration truly justify making changes we can never undo?

APR 15 1985

Exec	
Dir	
Asst Dir	
Chf	
Secy	
Adm	
Info	

APR 12 1985

PUB AFF	
ED	
RESOURCES	1
MINERALS	
OPERATIONS	
ADMIN	
TRNG CTR	
FLAGSTAFF	
CENT FILES	
ACTION	

Finally, I urge you to reconsider your recommendations for the adjoining North Maricopa and Butterfield Stage Memorial areas. The mere fact that they are separated by the old stage route does not support separate consideration for the two. The area is now in danger of being ruined as a wildlife shelter by powered vehicles. Wilderness designation would, of course, preserve them intact.

I hope you will consider my comments favorably. You have a great responsibility here: decisions made today will affect countless future generations, and once we make changes to these areas we can never undo the damage.

Sincerely,

James S. Greene

James S. Greene
8125 E. Buena Terra Way
Scottsdale, AZ 85253

132

Paul and Pamela Bosch
944 W. Main #1038
Mesa, AZ 85201
April 12, 1985

Phoenix District BLM
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Dear Sirs,

We are writing to urge you to strongly support wilderness recommendations for those area that have been proposed for wilderness designation within the Phoenix district. As the population of the Phoenix area expands, and as people from all over the country seek areas of natural beauty for recreation and enjoyment, it becomes increasingly important to protect the remaining wild and scenic areas within the state.

Many of the proposed wilderness areas contain important wildlife habitat, areas for hiking, camping, and climbing, and spectacular scenic beauty, which should be preserved for the current and future generations. Wilderness designation also makes good economic sense, since it attracts tourists to a resource that maintains its quality indefinitely, instead of providing short-term and destructive economic gain.

Some key wilderness study areas that we urge you to help preserve include those within White Canyon, Mt. Wilson, Coyote Mountains, Baboquivari Peak, Little Horn Mountains, Signal Mountain, and North and South Maricopa Mountains.

Please support recommendations for wilderness in those areas proposed in both the Phoenix Draft E.I.S. and the Lower Gila Draft E.I.S.

Thank-you very much for your time and any efforts you make to preserve what is left of the wilderness in Arizona!

Sincerely,

Paul C Bosch

Paul C. Bosch

Pamela R Bosch

Pamela R. Bosch

133

Morristown, Az.
April 16, 1984

Bureau of Land Management.

Dear Sirs,

We are very much against making wilderness areas out of the following: ^{river} Gila Wilderness South, Hassayampa Area and the Eagle Tail Mts.

We are senior citizens and members of the Wickenburg Gem & Mineral Society and are unable to hike into these areas. You should note, so called "Rock Clubs" are very much conscious of these areas and take care in protecting them when they use them.

Sincerely

Mrs. & Mrs. Virgil Davis

Star Rt. Box 11A

Morristown, Az.

95342

VIRGIL F. DAVIS
STAR RT BOX 11-A
MORRISTOWN, ARIZ.
85342



134

835 E. Orange Grove Rd.
Tucson, Arizona 85718

April 14, 1985

Marlyn V. Jones, District Manager
Bureau Of Land Management
Phoenix District Office
2015 West Deer Valley Road
Phoenix, Arizona 85027

RE: Lower Gila South Planning Area (RMP/EIS)

Dear Mr. Jones:

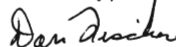
This desert of southwestern Arizona contains a rich and interesting region of low rugged and picturesque mountains. Its potential use for wilderness and protection is most deserving as bighorn inhabit much of this region.

I encourage you to give environmental protection through wilderness designation to the following areas:

2-125	New Water Mountains
2-126A	Little Horn Mountains West
2-127	Little Horn Mountains
2-128	Eagletail Mountains
2-129	East Clanton Hills
2-136	Face Mountain
2-138	Signal Mountain
2-142/144	Woolsey Peak
2-157	North Maricopa Mountains
2-163	South Maricopa Mountains
2-164	Butterfield Stage Memorial
2-172	Tabletop Mountains

As the west continues to expand, areas such as these which have wilderness potential will shrink and cease to exist completely. It is only through efforts such as wilderness designation that the natural character of the land will remain for future generations to enjoy.

Sincerely,



Dan Fischer

135

BLM PHOENIX DISTRICT

APR 19 '85

Southern California Edison Company

P.O. BOX 410
100 LONG BEACH BOULEVARD
LONG BEACH, CALIFORNIA 90801

R. J. JULIFF
MANAGER
OF
REAL PROPERTIES DEPARTMENT

District Manager
Bureau of Land Management
Phoenix District Office
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Gentlemen:

SUBJECT: Lower Gila South Planning Area
Draft Resource Management Plan/
Environmental Impact Statement (RMP/EIS)

Based on our review of the subject RMP report and our current information, we have the following comments and recommendations for your consideration.

We are pleased to see the recognition by the planning team of future corridor needs as an issue in the RMP. Corridor designation is a critical element of land use planning and is necessary to insure that routes are available for the orderly and efficient development of communication, energy and transportation systems to serve the public. We concur with the corridor element of the proposed action alternative; however, we recommend that it be revised to designate that corridors be a minimum of three miles in width.

Designation of the corridors described in the Proposed Action will provide the organizations responsible for developing communication, energy, and transportation systems for the public, a means of providing these services in an economical and dependable manner. In addition, a minimum corridor width of three miles will enable flexibility in siting facilities to avoid environmentally sensitive areas.

As you may be aware, Edison plans to construct an additional transmission line paralleling the existing Palo Verde-Devers 500kV T/L. The map (Map 102) shown within the text of the subject RMP, however, does not indicate the locations of the corridors in relation to the WSAs, known as 2-125, 2-127 and 2-128. We would, therefore, need to review a combined map with

SCE

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ADMIN	_____
OPS	_____
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P&EA	_____
PRA	_____
LGRA	_____
KRA	_____
CF	_____
Action By	_____
Due Date	_____

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all wilderness designations and utility corridors prior to making a more definitive statement regarding the availability of future transmission lines within your designated corridors.

Thank you for inviting our comments. We hope you will give them your full consideration. If further details are needed, please contact Mr. J. R. Wilson at (213) 491-2844.

Very truly yours,

Dale L. Woodward
DALE L. WOODWARD
LAND PROJECT SUPERVISOR

JRWilson/djd/

Response - Letter 135

135-1 There are three reasons why our utility corridors are proposed to be one mile wide. First, there has not been any indication that there is enough demand to justify the designation of three-mile wide corridors. Secondly, corridor designations of more than one mile in width would produce serious resource conflicts with wildlife habitats, wilderness study areas, etc. The third reason for designating one-mile wide corridors is that these corridors will directly link up with the corridors being proposed in the Yuma District BLM.



United States Department of the Interior

BUREAU OF MINES

P. O. BOX 25086
BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225

Intermountain Field Operations Center

April 19, 1985

Memorandum

To: District Manager, Phoenix District Office, Bureau of Land Management, 2015 W. Deer Valley Road, Phoenix, Arizona 85027

From: Chief, Intermountain Field Operations Center

Subject: Review of Draft Resource Management Plan and Environmental Impact Statement (RMP/EIS) for the Lower Gila South Planning Area, Arizona

We have reviewed the Lower Gila South Planning Area draft RMP/EIS as you requested and offer the following comments.

The Bureau of Mines interest in the proposed plan concerns potential impacts on mineral resources and their development. We consider the overall presentation of mineral-related data in the report to be excellent. The relative impacts on mineral exploration and development under each alternative are clearly stated and easily found in the text. Of the alternatives considered, the No Action and the Resource Production (No Wilderness) plans are clearly the most favorable for future mineral development. The Proposed Action, however, would have less negative impact on minerals than any of the remaining plans, and, in our opinion, offers a reasonable compromise among the competing land uses.

The Proposed Action plan recommends four areas (189,750 acres) for inclusion in the National Wilderness System. Areas favorable for mineral occurrences have been identified in all four. Generally, areas likely to contain locatable minerals or geothermal resources shown in the RMP/EIS agree well with favorable mineral areas identified by this office during preparation of the Land Use Restraints on Exploration and Mining (LUREM) report for Arizona.

Boundary adjustments recommended in the proposed action plan would mitigate some of the adverse impacts on mineral exploration and development caused by conflict with existing Wilderness Study Areas (WSA). We suggest similar adjustments where other favorable mineral areas occur along WSA boundaries. Although adjustments may not always be possible, such as in the New Water

Mountains WSA where most of the lands favorable for mineral occurrences are included in a withdrawal application to enlarge the Kofa Game Range, they should be considered and implemented where feasible.

We have no objections to the document as written.

William Cochran
William Cochran

137

Kenneth J. Eckstein
P.O. Box 1446
Payson AZ 85547

April 18, 1985

Phoenix District BLM
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Dear Sirs:

I am writing to express my support for designating several BLM study areas as federal wilderness. Many of these areas, I realize, are not being proposed as wilderness by your agency, but I believe that there are compelling reasons for including them in your wilderness recommendations.

The rapidly increasing recreational population in Arizona, coupled with the unbelievable popularity of 2, 3, and 4-wheel "all terrain" vehicles mandates protecting these study areas, regardless of size. I am concerned about erosional damage, trampling, and disturbance of sensitive wildlife, besides disruption of solitude and primitive recreation, via noise pollution and careless intrusions.

In particular, I strongly support the BLM recommendation that the Babogquivari Peak study area become legally designated wilderness, and also the 3245 acres of contiguous state land, should it be acquired. The White Canyon area should also be given wilderness protection for its dramatic, rugged features. As the American copper industry may never recover from foreign competition, I believe any moderate potential for copper production in this area will never, in the long run, equate with the value inherent in the land left unexploited commercially.

The study area known as Mt. Wilson near Hoover Dam has

always fascinated me with its austere, mysterious land forms and still viable bighorn sheep population. It deserves legal wilderness designation. Another area I support for designation is the Coyote Mountains. Regardless of size, it encompasses much that warrants preservation - prehistoric Indian ruins, sensitive wildlife species, and 8 species of protected plants, besides having "outstanding opportunities for both solitude and primitive recreation."

Areas within the Lower Gila South Draft EIS, that I favor for wilderness protection include the Little Horn Mountains and Little Horn Mountains West, Signal Mountain and the North Maricopa Mountains / Butterfield Stage Memorial for similar reasons. These areas should be reserved for future generations before off-road vehicle use or mineral exploration or development scars them.

Collectively, all these areas represent only a modest percentage of Arizona's BLM land, and in my opinion, the benefits to be derived from wilderness designation - scientific study, preservation of crucial wildlife habitat, and opportunities for solitude - far outweigh possible short-term exploitative returns.

Thank you for considering my perspective.

Sincerely,

Kenneth J. Eckstein

Kenneth J. Eckstein

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Phoenix District BLM
2015 W. Deer Valley Road
Phoenix, AZ 85027

APRIL 18, 1985

We would like to learn more about the BLM's recommendations for wilderness designations in Arizona. We heard that White Canyon, Mt. Wilson, Coyote Mts., Little Horn Mts., Signal Mt., North Maricopa Mts., Swansea, Trigo Mts., Muggins Mts., East Cactus Plain were not considered for wilderness areas. We feel that these areas should be included due to the scenic and unique wildlife value this areas provide. We are happy that Baboquivari Peak is considered for wilderness designation and we support strongly the planned land acquisition to enlarge the wilderness area.

Please let us know how we can participate in the fate of the spectacular wild country we have in Arizona. We would appreciate more information about the proposed wilderness areas and the above mentioned areas which were not proposed for wilderness designation.

Sincerely,

Vincent + Barbara Roth

Vincent and Barbara Roth
Box 6
PORTAL AZ 85632

MR. BARBARA ROTH
BOX 6
PORTAL, AZ
85632

RECEIVED
APR 22 1985
BLM

139

L. Cunningham
2001 W. Coolbrook Ave
Phoenix, AZ 85023

4/13/85

Dear Sirs,
I'm writing to inform you that I want White Canyon, Hell's Canyon, Mt. Wilson, Coyote Mountains, Picacho Mountain and Baboquivari Peak designated as Wilderness Areas. I have been to a few of these places and enjoyed their beauty greatly. We should save as much undisturbed (or little disturbed) areas as we can for future generations. This is how we pay our debt for have destroyed so much already.

Sincerely,

Lisa Cunningham

140



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

APR 17 1985

Mr. William Carter
Phoenix District Office
Bureau of Land Management
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Dear Mr. Carter:

In response to a request from W. Dean Bibbs, Arizona State Office Director, Bureau of Land Management, we have reviewed the Draft Resource Management Plan/Environmental Impact Statement for the Lower Gila South RMP/EIS Area. Our review was directed to whether the action described in the draft document involved matters within our jurisdiction by law or special expertise or had any impact on NRC licensed facilities.

Our comments are related to the Palo Verde-Devers and Palo Verde-Kyrene transmission lines associated with the Palo Verde Nuclear Generating Station (PVNGS) located near Buckeye, Arizona. As shown on Page 5 of the EIS, portions of these lines traverse BLM lands. We have addressed the construction and operational environmental impacts of the PVNGS and transmission line system as part of the NRC licensing review process. We are pleased to note that BLM proposes to designate one-mile wide corridors to accommodate existing and new utility systems. The use of existing corridors for new utility projects should result in fewer environmental impacts than allowing utility corridor development in new areas. The discussion of environmental consequences of the proposed action (Chapter 4, page 63) should be expanded to include information on anticipated impacts to vegetation and wildlife from construction and maintenance of utility corridors. A discussion of the impacts of utility corridor access roads also should be included. To gain a better understanding of impacts from implementing the utility corridor concept, information is needed on additional utility projects planned for the 10 one-mile wide corridors identified on page 4 of the EIS.

Thank you for the opportunity to review the draft document. Please contact Mr. Edwin Pentecost (FTS 492-8099) if you have questions concerning our comments.

Sincerely,

James A. Knight, Acting Director
Division of Engineering
Office of Nuclear Reactor Regulation

Response - Letter 140

140-1

Because there are no specific proposals at this time, it is difficult to anticipate the actual placement, number, and types of systems within these corridors. Without this information it is not possible to discuss specific impacts to vegetation, wildlife, etc., in this document. These impacts will be addressed during the specific environmental assessment/EIS for the individual proposals.

140-1

142

DENNIS C. JENNINGS
Box 1498
Wickenburg, AZ 85358
April 19, 1985

Marlyn V. Jones, Manager
Phoenix District
Bureau of Land Management
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Subject: Comments on Lower Gila South RMP/EIS Draft

As a former student of the University of Arizona and constant searcher for minerals, I would like to comment on your Lower Gila South RMP/EIS Draft.

I spent much time in the New Water Mountains and consider them and the area as a highly mineralized part of Arizona. Any good geologist will tell you the same thing. It seems to me to be a crime against the public to lock this area up simply because it is an area of 5,000 acres or more of sparsely occupied land. My common sense makes me think you couldn't possibly be foolish enough to do such a thing.

Please return New Water Mountains and the Area to Resource Production so we can all benefit now and forever!

Very truly yours,

Dennis C. Jennings
Dennis C. Jennings

cc: file

143

DOROTHY DEVAULT
P. O. Box 1498
Wickenburg, Arizona 85358

April 21, 1985

District Director
Phoenix Office
Bureau of Land Management
2015 W. Deer Valley Road
Phoenix, AZ 85027

Reference: LOWER GILA SOUTH New Water Mts.
Eagletail Mountains
Woolsey Peak
Table Top Mountains

Dear Sir:

I agree with the recommendation that a number of WSA's are unsuitable for wilderness. But that's not all. The above four areas are only wilderness by virtue of the fact that they are sparsely settled or developed. We may have discovered most of the surface minerals that are visible. But the potential for discovery of new minerals and energy resources is great because of the state's historically proven record of mineral and energy-resource production. Let's not lock up the areas but place them in resource production.

In resource production we can all benefit-ranchers, hikers, miners, tax payers, retired older explores and people like me who are too tired or smart to hike in the desert.

Very truly yours,

Dorothy Devault
Dorothy Devault

COMMENTS AND RESPONSES

145

JACK DEVAULT
Box 1498
Wickenburg, AZ 85358
April 21, 1985

District Manager
Bureau of Land Management
2015 W. Deer Valley Rd
Phoenix, AZ 85027

Re: Lower Gila South
1) New Water Mountains
2) Eagle Tail Mountains
3) Woolsey Peak
4) Saddle Top Mountains

Dear Sir:

Thank you for your above draft. I take exception to your recommendations for the above four areas. There's no adequate mineral report. And to my knowledge there's especially a lot of mineralized areas in the New Water Mountains. And even if there were no minerals there's other reasons for not locking up the areas. I am only one of the high percentage of people in Arizona that has no business hiking in the desert. But I have driven on the old roads and trails and expect to again as long as I live — providing I am not locked out.

We have lost enough land to withdrawals already. We need resource production in Arizona. Let wilderness be created east of the Mississippi to balance their own areas.

Thank you.

Sincerely,
Jack Devault

245

Cecil A. Devault
P. O. Box 1498
Wickenburg, AZ 85358

April 20, 1985

DISTRICT MANAGER
Phoenix District
Bureau of Land Management
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Re: LOWER GILA SOUTH RMP/EIS - New Water Mts.,
Eagle Tail Mts., Woolsey Peak, and Table
Top Mountains.

Dear Sir:

For more than 20 years I have prowled the back roads in search of new adventures, new flora and fauna and different rocks and formations. Many times I left my vehicle and hiked over the ridges. In reading your draft report it seems as if you are trying to take this privilege away altogether. Also I cannot find where an adequate mineral report has been made. If this is ever made into a wilderness area officially, there is no need to ever visit or stay in the towns nearby.

Please return these areas to Resource Production so that we may have the pleasure of driving on the old roads and trails and ever exploring what is beyond the next turn or ridge.

Sincerely,

Cecil A. Devault
Cecil A. Devault

Response - Letter 245

245-1

Wilderness designation of all lands recommended for wilderness under the Proposed Action would close 190,391 acres to ORV use. This acreage represents 9.4% of the public lands in the Lower Gila South Planning Unit. Other lands could remain open to ORV use with no ORV designations. All nonmotorized recreation uses could continue in wilderness, including rockhounding and nature study.

246

April 22, 1985

PHOENIX DISTRICT BLM
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

As a concerned citizen and active hiker I believe it is crucial to preserve Arizona's unique public lands. Contrary to popular belief many of these lands are under the control of the BLM. I feel it is necessary to designate these unique lands as wilderness areas for two reasons. One, to preserve their natural beauty and offer opportunities for recreational experiences. And two, to maintain the BLM's reputation as a multiple-use agency, not as an agency controlled by the ranchers.

Although I have not visited all of the areas being considered for wilderness designation, I do recommend that they all be so designated. These areas include the lands listed in the Phoenix draft environmental impact statement and those listed in the Lower Gila South draft environmental impact statement. I realize that probably all these lands cannot be designated as wilderness, however I strongly recommend that at least Mt. Wilson, Baboquivari Peak, White Canyon, the Coyote Mountains, Signal Mountain, Little Horn Mountains and Little Horn Mountains West, North Maricopa Mountains and the Butterfield Stage Memorial be added to Arizona's wilderness. Your consideration of this matter is greatly appreciated.

Sincerely,

Charles J. Campbell
Charles J. Campbell
1024 S. Dorsey Ln. - #1
Tempe, AZ 85281

-149-

247



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

KOFA NATIONAL WILDLIFE REFUGE
P.O. BOX 6290
YUMA, AZ 85364

April 26, 1985

Mr. Marlyn Jones, District Manager
Bureau of Land Management
Phoenix District Office
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Mr. Jones:

I have reviewed the draft of the Lower Gila south RMP/EIS with particular interest in how the plan relates to Kofa National Wildlife Refuge. The U.S. Fish and Wildlife Service has a withdrawal application (A7950) for an area that includes BLM's Wilderness Study Area 2-125. The Service is interested in having this area withdrawn and added to Kofa NWR. We would not want the RMP creating a conflict with our withdrawal application or causing management conflicts should this area be added to the refuge. Designation of a portion of WSA 2-125 as wilderness would be compatible with our withdrawal and wilderness proposal.

247-1

Map 1-2 appears to indicate that utility corridors 1 (El Paso Natural Gas) and 2 (Palo Verde Devers) leave Lower Gila South Area and enter Kofa National Wildlife Refuge. We feel utility corridors are not compatible with the purpose of the refuge and new facilities should not be permitted. There are facilities along this route at this time, however, we feel it should not be designated as a utility corridor and request the RMP be changed to indicate this.

There is a considerable amount of movement of desert bighorn sheep between the refuge and the Plomosa and New Water Mountains of the Lower Gila South Planning Area. Adverse impacts to bighorn sheep in either of these mountain ranges has the potential to adversely effect sheep within the refuge. Both mountain ranges are included within BLM's grazing allotment number 3022. The RMP/EIS discusses the conflict for forage between cattle and bighorn sheep, and the threat of diseases being transmitted from cattle to sheep. The plan also indicates 50% of the allotment is in poor to fair conditions (Appendix 15). Based on this information we recommend reducing or eliminating livestock grazing in those areas used by bighorn sheep and areas of poor range condition.

Thank you for the opportunity to comment on the RMP/EIS.

Sincerely,

Milton Haderlie
Milton Haderlie
Refuge Manager

COMMENTS AND RESPONSES

248



ARIZONA MINING ASSOCIATION

 BLM PHOENIX DISTRICT C. J. HANSEN
President

April 25, 1985 APR 29 '85

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<input checked="" type="checkbox"/>	Action By
<input checked="" type="checkbox"/>	Due Date

Mr. Marlyn V. Jones
District Manager
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Dear Marlyn:

I thought you may be interested in the enclosed copy of the letter I submitted in connection with the oversight hearing on BLM wilderness. I had not intended to submit comments, but after reading some of the statements by environmental groups that were sent to me by Jean Toohey, I decided we needed to say something in defense of both mining and the BLM.

With kindest regards,

Sincerely,

C. J. Hansen

CJH/jc

Response - Letter 247

247-1 Currently there are three pipelines and one 500 KV transmission line that parallel each other within these proposed corridors. According to BLM Manual 1275, Appendix 2, page 12 -item 28, three parallel rights-of-way are by definition a corridor and are to be designated on the public land records as such. Additionally, we feel there is ample room to allow more systems in these proposed corridors, and the subject land is suitable for this use. It should also be noted that designation would only apply to the BLM administered lands and not those lands within the confines of the KOFA Wildlife Refuge.



ARIZONA MINING ASSOCIATION

C. J. HANSEN
President

April 24, 1985

The Honorable John F. Seiberling
Chairman
Subcommittee on Public Lands
Committee on Interior & Insular Affairs
U.S. House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

I regret that I was unable to appear personally at the hearing conducted by the Subcommittee on the wilderness program of the Bureau of Land Management. This matter is one of substantial interest to the mining interests in Arizona, and I hope you will give some consideration, if not official inclusion in the hearing record, to my views.

The Arizona Mining Association represents 15 major mining companies which produce from their operations in this State two thirds of the nation's copper, and much of the molybdenum, silver and gold produced in the U.S.

Our concerns are directed to any and all governmental actions that would create additional wilderness areas or create further withdrawals of locatable mineral lands from the public domain. We believe this industry acted with responsibility and reasonableness in our presentations on the Arizona RARE II wilderness bill that was enacted by the Congress. We made a considerable effort to limit our objections to those areas (and even areas within areas) that had a proven potential for mineral development.

Our basic problem is with the cumulative effect of these withdrawals. Taken piecemeal, each single area has some justification for being assigned a special use. However, when all of these uses are added up, be they for wilderness, wildlife refuges, national park expansions, national monuments, bombing ranges, military reservations, reclamation sites or whatever, there is a staggering infringement upon the public domain and a continuing shrinkage of the portion that remains open to exploration and location under the mining laws.

page 2

In Arizona, for instance, the existing wilderness areas already total some 2 million acres and it is estimated that about 30 million additional acres in this State have been put "off limits" to mining uses, either by outright prohibition or extremely restrictive requirements. On a national basis, approximately two thirds of all public lands are effectively withdrawn from the development of mineral resources.

For these reasons, we oppose any undue pressure upon the Bureau of Land Management to increase or modify the recommendations it has formulated from its base of wilderness study areas (WSAs). Various environmental and pro-wilderness groups have criticized BLM for eliminating this or that area, and the major accusation is that the BLM recommendations do not include sufficient acreage.

It is the position of this Association that the personnel of the Bureau have performed a difficult job very well. Let us remember that it is the BLM staff that has the professional expertise to evaluate these areas; they have the familiarity and the knowledge of the characteristics and resources of the lands involved, and they are better equipped to make objective judgments regarding the suitability of those areas for wilderness values. Granted, advocates of more wilderness will disagree with these recommendations and insist upon the inclusion of many more parcels; our industry has objections to some of the areas recommended as wilderness because of what our studies show as a good potential for mineral development. It is assumed that the proper place for airing these disagreements lies more properly within the public hearing and comment procedures scheduled by the BLM to consider specific objections regarding the inclusion or exclusion of particular areas.

There also have been questions raised about the BLM's attitude toward wilderness and its diligence on enforcement of its role as a custodian of public lands. On the first point, I believe this agency has been completely even handed in its approach to whether specified areas truly contain those unique values that qualify as wilderness potential. The fact that BLM recognizes valid uses of its land for other purposes should not be construed as any bias toward wilderness. We also are told that the BLM is lax in protecting public lands against misuse by miners, grazing people and off-road vehicles, among others. I'm sure that for every example of enforcement lapses cited by environmentalists, our respective industries could cite considerably more instances of overregulation and unduly harsh restrictions.

The BLM is confronted with the extremely difficult task of attempting to administer and regulate tremendous acreages of public lands with very limited manpower and other resources. They have performed well and in a professional fashion that is far more deserving of praise than criticism.

Finally, as with the RARE II process, there are those who want to resolve their dissatisfaction with more study and more review. Let us hope that these BLM lands do not spend years and years in the limbo of governmental indecision. The BLM has proceeded with its formulation and evaluation of wilderness study areas in a good and timely fashion. We need to go forward with this process and complete the determination of which lands should be designated as wilderness and which lands should be released for other uses.

Respectfully submitted,

C. J. Hansen
President
Arizona Mining Association

CJH/jc

pc: Representative Udall
Representative McCain

250



Department of Energy
Western Area Power Administration
Boulder City Area Office
P.O. Box 200
Boulder City, NV 89005

Refer To: G1010

APR 25 1985

District Manager
Bureau of Land Management
Phoenix District Office
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Dear Sir:

We appreciate the opportunity to review the draft Lower Gila-South Resource Management Plan and Environmental Impact Statement. Western's directive to meet public demand for Federal power using Federal transmission lines will best be met by close coordination between our agencies. Our comments regarding your document are as follows:

- * Western agrees with protecting the resources of an area. We think an approach for a mix of natural and commercial resource uses while minimizing disruption of the human environment is the best approach to resource management.
- * Therefore, Western is agreeable to the corridor concept of utility sitings. We notice that your proposed action (Map 1-2) does not provide corridors where several Western transmission lines are existing. Since your office is not providing appropriate corridors, Western cannot support your proposed action or the other alternatives as presented in the DRMP/EIS except the no action alternative.
- * Experience has shown that corridors of only 1 mile in width are too restrictive for proper planning and siting of transmission lines. The state of the art corridor widths are from 3 to 5 miles. The proposed restrictive 1 mile wide corridors force impacts to resource which could be avoided by the appropriate width corridors. In addition, the National Electrical Safety Code dictates proper spacing of transmission lines. Forcing transmission lines close together causes many technical problems which increase costs and threatens the reliability of the system. Due to the rapid population growth in the Southwest, Western along with other utilities will be required to provide power including Federal power that is available to these customers thus the need for future transmission lines. Otherwise, the siting of transmission lines on a case by case basis would be acceptable.
- * The text only indicates two existing communications sites. However, if other new sites are evaluated on a case by case basis that is acceptable. Communication sites are chosen based on paths of direct line of sight. Any physical blockage of this line of sight forces new paths. Western will use the existing sites whenever possible but technical requirement directs that flexibility must be allowed for Western to meet its directives. Sites have to be selected for non-interference (line of sight) from new facilities to the best vantage point for the system.

Our conclusion is that some of your proposals are too restrictive for proper administration. If your office would adjust the corridor widths to 3 to 5 miles wide, allow for proper technical siting of communication sites, and include all Western's existing transmission lines in corridors then Western could support your preferred alternative. Otherwise, Western has to support your no action alternative.

Sincerely,

G. J. Giles
G. J. Giles
Assistant Area Manager
for Management Services

cc: Gary Frey (A04106)
Environmental Manage
Western Area Power Administration
Golden, CO

Response - Letter 250

250-1

The proposed corridors have been based on existing major transmission systems within the planning area. Some of these systems include large pipelines, ultra-high voltage transmission lines, and interstate highways. These systems mainly form interstate routes that will continue to be desirable for additional systems in the future. We do not feel it is in the best interest of multiple-use management to designate a three- to five-mile wide corridor around the multitude of smaller transmission systems throughout the planning area. These types of systems can be dealt with on a case by case basis; therefore, we feel the proposed corridors are adequate.

Currently there has not been enough demand predicted to justify the designation of 3-5-mile wide corridors. We feel that the current 1-mile wide widths are adequate for current and future utility needs. Also, there are resource values in the planning area such as wilderness, visual, etc., that preclude the designation of corridors as large as you recommend.

250-1

251

David Lutz
6931 W. Arrow
Tucson, AZ 85746
Apr 21, 1985

Phoenix District B.L.M.,
2015 West Deer Valley Rd.
Phoenix, AZ. 85027

Dear Sirs;

I am writing to you concerning the BLM's Lower Gila South EIS. I strongly urge you to prevent further development in this area especially mining. In a fragile desert mining leaves scars that are hard to erase. The areas that are roadless should remain as such. No more roads should be built in this area. We are turning out of wild lands. Too much of our public lands have been scarred by mining and other development. I urge you to declare as wilderness all the land in this area that is still wild and roadless.

Very truly yours,
David Lutz
RECEIVED
PHOENIX DISTRICT
B.L.M.

252



National Parks & Conservation Association

1701 Eighteenth Street, N.W. • Washington, D.C. 20009

RUSSELL D. BUTCHER
Regional Representative
SOUTHWEST & CALIFORNIA
Box 67
Cottonwood, AZ 86326
(602) 634-5758

(202) 265-2717

April 25, 1985

RE: Lower Gila South Resource
Management draft EIS

Mr. Marlyn Jones
District Manager
Phoenix District Office
Bureau of Land Management
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Dear Marlyn:

We appreciate this opportunity to offer some comments on the Lower Gila South Resource Management Plan draft Environmental Impact Statement. May we offer the following thoughts:

We are particularly enthusiastic about the Eagletail Mountains (AZ-020-128) and New Water Mountains (AZ-020-125) being proposed for wilderness areas. These are outstanding areas. The Eagletails are an especially scenic, boldly upthrust rocky ridge of mountains. We realize there are some man-made impacts along the northeasterly side of the mountains that appear to require a less than ideal wilderness boundary. We urge that every effort be made to evaluate the array of impacts to determine if perhaps some of them at least can be viewed as non-impairing to the overall quality of the proposed wilderness area in the long-term. We hope it may prove possible to refine and improve upon that stretch of boundary.

Regarding the New Water Mountains, not only is this unit deserving of wilderness status on its own merits, with its interesting topographical/geological features; but it should perfectly complement anticipated wilderness designation in the adjacent Kofa National Wildlife Refuge. As with the Eagletail boundary, we hope that every effort will be made, along the northern edge of the proposed wilderness area, to exclude only those human impacts that are truly significant impairments in the long term. We understand there may be some valid (?) mineral claims and mineral exploration activities in the northern part of the WSA that apparently preclude that area from being included in the proposed wilderness. Is there no way to exchange out at least some of those mineral interests where there is, as yet, no significant impact upon the land?

252-1

COMMENTS AND RESPONSES

252-1 Although we are not personally familiar with the Woolsey Peak area (AZ-020-142/144), this unit appears to have merit as a wilderness proposal. We notice that there are some 240 mineral claims (valid?) within the area with a "medium" potential for development. Is there any chance of exchanging out any of those valid mineral interests? Also, we wonder about the status of the "vehicle way" running through the middle of the proposed wilderness area. What is the nature of that route?

252-2 Will it be possible to effectively close this way at the wilderness boundaries or beyond?

We are likewise unfamiliar with Table Top Mountains (AZ-020-172). But judging from the description in the EIS and descriptions of the area by those who've visited the area, we agree with the recommendation for wilderness. The "40-acre isolated grassland community" gives this unit a special added natural feature that is almost unique in the entire Southwest. Again, we wonder if the mineral claims (valid?) can be exchanged out of the proposed wilderness area, particularly as they are characterized as having "high" mineral potential.

252-3 One of the WSAs recommended as unsuitable for wilderness, that we seriously question, is the Little Horn Mountains (AZ-020-127). From information available to us, this area appears to deserve the special protection that wilderness designation affords. Particularly the part of this WSA shown within a "Resource Protection Boundary" (map on page 117) seems to us to merit wilderness protection--as both outstandingly scenic and fundamentally free of the impacts of man. If there are valid mineral claims that could pose a conflict with wilderness protection, is it not possible to pursue mineral exchanges?

Some of our contacts have suggested that Signal Mountain (AZ-020-138) deserves wilderness protection, and that more information is needed regarding the location of "gold" that "may be supreme in nature and worthy of mining." Perhaps special negotiations or exploratory talks between those having such a potential mining interest, the wilderness proponents of the area, and the BLM staff could at least determine whether the location(s) of such gold resources could pose a serious threat to the integrity of the most important part of the Signal Mountain area. This appears to possibly be one of those minerals versus wilderness conflicts that might be resolvable through open direct dialogue by the various interests.

252-4 Regarding the North and South Maricopa Mountains, we are wondering, if these areas do not become part of the wilderness system, what measures will the BLM implement to safeguard the array of pre-Columbian sites? If ORV activity increases throughout this area, will it be possible to protect the cultural resources from ORV damage?

We appreciate this chance to comment on the draft EIS document for Lower Gila South. We regret our Association lacks greater personal familiarity with the majority of these WSAs, but hope the above thoughts and suggestions may be helpful.

Please let us know, Marlyn, if we can be of further help.

With best regards,

cc; D. Dean Bibbes

Just
Russell D. Butcher
Southwest & California Representative
Box 67, Cottonwood, AZ 86326

Response - Letter 252

252-1 There is no statutory nor regulatory provisions to allow exchanging of unpatented mining claims.

252-2 The vehicle way is a primitive route crossing the unit for 8 miles. Its presence is not considered to pose a wilderness management problem since opportunities exist to control access. The route does not access any range developments or claims and ends in Painted Rock Reservoir.

252-3 See response 252-1.

252-4 It is our intention to analyze those areas not designated as wilderness for possible ORV designation and for special management areas. The Maricopa Mountains could be included in this analysis. Also see response 45-1.

253

ARIZONA DESERT BIGHORN SHEEP SOCIETY INC.

P. O. Box 5241 • Phoenix, Arizona 85010

April 26, 1985

Mr. Marilyn V. Jones, District Manager
Phoenix District
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona 85027

Re: Draft Lower Gila South Resource Management Plan and
Environmental Impact Statement

Dear Mr. Jones:

The Arizona Desert Bighorn Sheep Society, Inc. would like to make the following comments on the Draft Lower Gila South Resource Management Plan and Environmental Impact Statement. Please include our comments as part of the official review record.

The Arizona Desert Bighorn Sheep Society supports the Resource Protection alternative.

The Lower Gila South RMP/EIS area contains the majority of the state's desert bighorn sheep habitat. We feel the resources proposed under the Resource Protection alternative make it the best package of the five alternatives for the long term benefit of desert bighorn sheep.

The Rangeland Management portion of the Resource Protection alternative proposes a 47% reduction in authorized grazing preference. While we are concerned with increasing livestock use and possible competition with bighorn sheep, we are equally concerned with the grazing of stocker cattle under ephemeral permit authorization. More attention must be paid by the BLM to animal numbers and dates of use under ephemeral permits. Stocker animals left on the range past the time of annual forage availability and stressed as the range source becomes depleted. Bighorn sheep are also stressed for the same reason. Viral diseases which are spread by the stocker animals become active when sheep are subjected to the stress of forage competition with cattle. The result can be severe mortality in a short period of time. For this reason, we urge the BLM to pay particular attention to the OFF date of ephemeral grazing permits by not allowing authorization past the time annual forage is green and edible.

Another problem associated with ephemeral permits is stocker animals, unfamiliar with terrain, drifting into bighorn sheep habitat and locating around important bighorn waterholes, thereby competing with bighorn for forage and water and transmitting disease. A classic example of this occurs in the Vekol Valley whenever stocker animals are put on the South Vekol allotment. Because there is no west boundary fence on the allotment, stocker animals drift into the Sand Tank Mountains. The wayward animals find their way to the best permanent water on the mountain. This is the ADBSS's Indian Spring Pothole development. The owners of the livestock do not make an effort to gather these animals unless they are contacted by concerned Sheep Society members. If the livestock elude the cowboys they spend the summer at Indian Spring and cause a definite competition problem for the bighorn sheep in the Sand Tanks. We suggest one of the Bureau's top range and wildlife priorities should be fencing the west boundary of the South Vekol allotment from the Papago Indian Reservation on the south to the Whit Hills on the north. This is a distance of about nine miles. Gates should be placed on the roads leading into the Sand Tanks to provide access for the general public.

The Resource Protection alternative would designate portions of seven wilderness study areas (WSAs) for recommendation toward inclusion into the national wilderness system. Of these seven the New Water Mountains, Little Horn Mountains, and Tuletail Mountains contain the best bighorn sheep populations. The remaining three areas have sheep populations which will require help to ensure their stability.

The ADBSS has concerns with wilderness designation. These are: 1.) our ability to have continued reasonable vehicular access to our waterhole project sites for construction and maintenance; 2.) our ability to continue to use hand held gas powered drilling devices and portable welders for construction and maintenance of waterhole projects; 3.) the ability to use helicopters to transport the necessary tools and equipment to, and remove them from, the project sites; 4.) the continued use of helicopters and motorized equipment in the capture of bighorn sheep for transplant purposes; and 5.) allowing reasonable vehicular access to these areas by legally licensed and permitted bighorn sheep hunters, and associated guides, for the purpose of pre-season scouting and actual sheep hunting.

COMMENTS AND RESPONSES

Response - Letter 253

253-1 See Table 2-1, South Vekol No. 3080 of the draft EIS. Part of the proposed funding would be for boundary fence construction between the South Vekol allotment and the Luke-Williams Air Force Range.

253-2 Concern 1. Use of vehicles will be identified and addressed in the wilderness management plan. All vehicle use must be approved by the State Director. Use of vehicles to develop new projects and maintain existing ones will be evaluated on the rule of practical necessity and reasonableness.

Concern 2. Power hand-portable tools, such as chain saws or rock drills, may be approved by the State Director when they are the minimum necessary for administrative purposes where work cannot be accomplished with nonpowered tools. Use of such tools will be addressed in the wilderness management plan.

Concern 3 and 4. The wilderness management plan will specify the instances and places in which use of aircraft is the minimum necessary to administer the wilderness resource or is necessary as part of a nonconforming but accepted use. State Director approval is required.

Concern 5. Travel within a BLM-administered wilderness will normally be by nonmotorized, nonmechanical means consistent with the preservation of wilderness character. Hunters will not be allowed motorized access.

-3-

If all of the above concerns do not fall within the guidelines of the BLM's Interim Management Policy, we would like for them to be so included. The Society's waterhole development and transplant work is important enough to the desert bighorn the BLM should facilitate our efforts on the sheep's behalf.

We support the concept of wilderness designation for the seven WSAs proposed under the Resource Protection alternative and believe wilderness designation will serve the best interests of bighorn sheep habitat protection over the long term.

Designating utility corridors is a sensible way to address existing and future energy systems in an orderly way. We feel particular attention must still be paid to planning each project on a case-by-case basis so construction during critical times of the year, such as bighorn lambing, can be avoided.

Thank you for the opportunity to comment on the plan. With the proper implementation and funding of the Resource Protection alternative, the Arizona Desert Bighorn Sheep Society, has faith that the benefits to desert bighorn sheep within the EIS area will be assured.

Sincerely,

Jim Fiedler

Executive Board by
Jim Fiedler, President

cc: D. Dean Bibler, State Director

255

Phf +
LBRa

KAREN MAGNAN
1517 West Impala Avenue
Mesa, Arizona 85202

April 22, 1985

BUREAU OF LAND MANAGEMENT
Phoenix District
2015 West Deer Valley Road
Phoenix, AZ 85027

As an Arizona resident for 28 years, and a taxpayer, I would like to express my support for the following:

White Canyon - This is a beautiful canyon with numerous tributaries, and I recommend wilderness protection for this area.

Mt. Wilson - This area has outstanding scenic values, challenging terrain, and excellent opportunities for solitude, and also provides crucial habitat for bighorn sheep. I support wilderness protection for this area.

Coyote Mountains - This is a spectacular area of exfoliating granite domes reminiscent of Yosemite, a highly scenic, natural desert landscape characterized by rugged desert peaks, cliffs, rockfaces, and dense Palo-Verde-Saguaro and interior chaparral plant cover. Such undisturbed terrain would provide outstanding opportunities for both solitude and primitive recreation. The area has seven special status wildlife species and eight protected plant species. I recommend wilderness designation for this area which would also protect 250 culturally sensitive acres containing a classic period Hohokam Indian compound.

Baboquivari Peak - This dramatic 7,000 foot mountain is a popular hiking and climbing area and is a sacred peak to the Papago Indians. I understand the BLM is recommending the entire WSA as wilderness, but I want to add my support for reinforcement to proceed with the land acquisition.

LLS

-2-

Little Horn Mountains/Little Horn Mountains West - These two areas contain a remarkable collection of volcanic features. I recommend wilderness designation for these areas.

Signal Mountain - This area offers rugged, colorful terrain with sweeping views of surrounding mountain ranges and is separated by a single dirt road from the adjoining Woolsey Peak WSA, which was recommended for wilderness designation--please include Signal Mountain too.

North Maricopa Mountains/Butterfield Stage Memorial - These areas contain an abundance of cultural sites, including prehistoric rock shelters. These two areas should rightly be recognized as one. As these areas are threatened by off-road vehicle intrusions, I recommend wilderness designation for these areas as well.

Sincerely,

Karen Magnan
Karen Magnan

klm

-157-

COMMENTS AND RESPONSES

256

4/30/85

Dear Sirs:

Regarding our remarks on the draft RMP/EIS for the Lower Gila South Planning Area.

We request that you add the enclosed article by R H Ring which was in the Tucson Star, April of this year. It seems to prove one of our points.

Thank you

Landis Aden
Legislative Liaison
Honeywell Sportsman's Club
Phoenix Az

Remarks of the Honeywell Sportsman's Club concerning the draft RMP/EIS for the Lower Gila South Planning Area.
March 12, 1985

Gentlemen;

I am Landis Aden, representing the Honeywell Sportsman's Club of Phoenix Arizona.

We are generally in favor of wilderness areas. However we do have some serious concerns and reservations about these latest proposals.

Many of these areas seem to be of less than wilderness quality. (or are the standards declining?)

There has been about a million acres taken as wilderness in Arizona in the last year. We have encountered numerous difficulties with access to some of these areas, new and existing. These of us who are not Congressmen or Government officials and have no access to helicopters, have problems with finding a place to park at trailheads, or sometimes even finding the access road, if any. These problems are compounded of week-ends for those of us who have only week-ends off from our employment.

Several of our members are members of the Arizona Desert Bighorn Sheep Society. We have supported their efforts in the past and continue to do so. But, the proposed wilderness around the Kefa Game refuge, the Little Horn and New Water Mountains, could make access even more difficult.

We believe the wilderness quality areas in Arizona have already be studied, covered and withdrawn sufficeintly. We believe that these of us whe have many and varied interests in the outdoors should be left a place to pursue these activities.

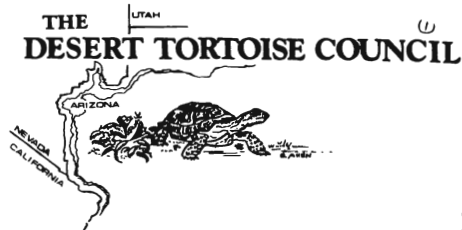
Thank you.

The following remarks were left out of the oral presentation.

We support multiple use of the land, over the many restrictions that yet mere wilderness areas would bring. We believe that the land can be effectivly managed by the BLM without any more new laws or regulations.

Finally, some of these areas appear to be overgrazed, and we feel there is a need for a reduction in the numbers of livestock in these areas. Cowchips on every square yard and under every tree and bush de little to enhance the "Wilderness Experience".

Landis Aden
Legislative Liaison
Honeywell Sportsman's Club
P.O. Box 8000 B61
Phoenix, Az 85066



5319 Cerritos Ave.
Long Beach, CA 90805

April 26, 1985

Marlyn V. Jones
District Manager
Bureau of Land Management
Phoenix District Office
2015 W. Deer Valley Road
Phoenix, AZ 85027

Dear Mr. Jones:

The Desert Tortoise Council regards the large Phoenix District as a holder of very valuable natural resources, including fish and wildlife. We support the concept of a resource management plan as a tool to balance competing resource demands while protecting and sustaining wildlife and other natural values. Unfortunately, none of the likely alternatives presented in the Draft Resource Management Plan/Environmental Impact Statement fulfills that concept, especially the Proposed Action.

Specific comments follow:

- 257-1 Page 2. Rangeland Management Issue. The Proposed Action does not attempt to resolve the subissues listed here. Wilderness Issue. The Estrella Mountain WSA should be included in this document and be proposed for management as wilderness or a protective alternative. FLPMA also directed BLM to designate and manage ACEC's. There are none mentioned in this plan, nor are there any specially managed areas such as primitive, scenic, or natural areas proposed.
- 257-2 Page 4. Land Tenure. Special attention will not be given to wildlife habitat values, according to this statement. Resolution of which lands should be retained is not considered. Utility Corridors. Why are communication sites avoided in this document? Surely BLM does not plan to allow every mountain top to become a radio tower forest. Careful analysis and planning of designated sites should have been done in this plan so that significant cumulative impacts could be evaluated, and possibly avoided. This is not done in the plan. "Studying" such things on a case-by-case basis is an open invitation to avoidance of long-term planning and
- 257-3

Response - Letter 257

(2)

257-1 The Sierra Estrella WSA was deleted from WSA status by a Secretary of the Interior decision (involving split-estate) implemented on August 9, 1983. On April 18, 1985 a District Court in California ruled that split-estate areas are to be considered for wilderness. This WSA will be studied for wilderness in an EIS scheduled to begin in 1986.

Scenic and natural area designation are land use classifications which BLM can apply administratively. They were not issues addressed in this RMP/EIS. However, we have clarified our intention in the final RMP (Chapter 2, Management Guidance Common to All Alternatives) to evaluate areas containing special and/or significant resource values for special management designations.

257-2 The text has been changed to include special attention to all resource values. The text has been changed to include retention under Land Tenure in Management Guidance Comments to All Alternatives.

257-3 We feel this issue was appropriately discussed in the document. It was stated that a complete and thorough site plan would be developed prior to any new sites allowed. We feel it is not appropriate to consider "cumulative" impacts created by communications sites. Because of changing technologies, it is not possible to predict future needs and plan for those needs. Our approach to communication sites will provide for public participation when a communication site plan is being developed.

257-3 proliferation of cumulative impacts that become significant but are avoided through lack of presentation to the public. The public does not get to see these case-by-case projects you allow on public lands. We have never seen one of your Environmental Analyses, even though we are on your mailing list.

257-4 Greenbelt Issue. The type of management on the Fred J. Weiler Greenbelt may have significant impacts on the environment. We see no reason to avoid planning for the greenbelt and hiding this land management from the public. The only logical place to discuss and analyze different types of management of the Greenbelt is in this RMP. It must be done in the RMP, since it is an issue. We question BLM's commitment to perform any positive management on the Greenbelt at all in light of the general lack of riparian management occurring now.

257-5 Page 5. This is a terrible map that the reader can not make sense of or compare with WSA boundaries which were mentioned as a problem. It seems a corridor could easily be placed to avoid a WSA, thus alleviating the problem.

257-6 Page 9. BLM proposes to do no changes in management where conflicts with wildlife resources occur. Conflicts with Sonoran Pronghorns (endangered) occur. Conflicts with mule deer occur (forage and water source availability). Mule deer forage conflicts occur mostly where use on browse is high. Conflicts with desert bighorns occur (disease, forage in foothills, water usurpation). Conflicts occur with the desert tortoise (trampling, usurpation of forage). None of these problems are addressed. These are significant conflicts and are causing significant impacts on wildlife. How does BLM Plan to manage ephemeral ranges under the ephemeral rule? Are there "safety valves" for the desert tortoise built in? Are there any multiple use considerations at all? What will they be? These should be fully discussed and analyzed in this plan. Where would supplemental permits not be issued and give examples.

257-7 Page 11. The water storage tank shown on page 11 is unsafe for wildlife. Is this BLM's standard practice for the area?

257-8 Page 10. There are no improve allotments. Why? Many allotments meet criteria mentioned in the Appendix for the Improve category. Where there is a conflict with wildlife there must be improvement, e.g., Sonoran Pronghorns and desert tortoises. All allotments with conflicts and/or a majority of the land in fair or poor condition need a change in management through some means, whether no grazing, cuts in numbers, seasonal grazing, or other improved management. Such allotments certainly are not "satisfactory."

257-9 Page 11. Which allotments would be monitored? In what priority (where there are conflicts?). What is "more intensive" monitoring and which allotment could be covered? What are the wildlife habitat objectives that need to be monitored? The place to tell the public is in the RMP/EIS.

257-10 Page 12. Changes in livestock numbers should require environmental analysis and public involvement. It should not be BLM policy to do this without public and other agency (Arizona Game and Fish) input.

257-4 We agree with you that the management of the Fred J. Weiler Greenbelt is a very significant issue. Planning for this area will be a useful tool and important in future management of the Greenbelt. That is why on page 4 of the RMP we have directed development of a comprehensive management plan for the Greenbelt. Furthermore, specific issues that will be looked at are identified in the RMP.

Currently, there are studies being conducted and ongoing coordination between the USFWS, Arizona Game and Fish Department and BLM. As a result of this coordination and these studies, we will have a better understanding of what should take place in the Greenbelt. We feel that by waiting for the information we can do a better job of activity planning for and management of the Greenbelt. By identifying the issue and committing to the preparation of a comprehensive management plan, we are meeting our planning commitments and will be able to develop an appropriate plan for the Greenbelt.

257-5 Due to terrain features and other resource values in areas, it is not possible to "easily place" corridors to avoid WSA boundaries. Sometimes to do so would result in increased resource damage.

257-6 See Chapter 2 under the Grazing Administration.

257-7 BLM Phoenix District water development policy requires that all storage tanks on new well developments be covered or be equipped with a floating platform to reduce wildlife drowning. Many older well storage tanks are not covered,

however, BLM personnel make every effort to install escape ramps and covers as funding becomes available.

257-8 The management categorization (MIC) establishes priorities for distribution of range improvement funds and the use of range personnel. Although a few allotments could be placed in the "I" category through strict application of the criteria (Appendix 12), Bureau Resource Specialist determined that the potential for increased production was not sufficient for a positive economic return in rangeland investments. This does not preclude changing existing management practices in order to mitigate resource conflicts. Allotments in the "M" category would be managed to prevent serious conflicts with wildlife resources and prevent resource deterioration. "C" allotments are generally ephemeral and perennial-ephemeral allotments that are in an overall acceptable condition with no serious resource conflicts and or are Section 15 allotments with a small percentage of public land within their ranch boundaries.

257-9 BLM will monitor allotments where livestock competes with the needs of desert tortoise, Sonoran pronghorn and other threatened or endangered wildlife species. Use adjustments may be necessary to reduce or eliminate forage conflicts.

257-10 Once monitoring studies have been evaluated and it is determined that adjustments may be necessary to meet objectives, adjustments would go through the environmental assessment process before final decisions are issued.

③

Since the WSA's met wilderness criteria, they must, somehow, be "suitable." BLM has provided no rationale for areas being proposed or not proposed for designation. BLM has not stated how each area was evaluated for designation. We question the criteria BLM used to come up with designatable areas. Many areas with critical natural renewable resource values and fine wilderness characteristics are not proposed, with no good rationale. For all the reader knows, the proposed areas were picked out of a hat and reduced boundaries were done arbitrarily without thought to resource protection.

We question how 73,123 acres can be "isolated" or difficult or uneconomical to manage. This area is relatively close to Phoenix (much more economical than other areas to get to). What are the criteria for difficult or uneconomical? Getting rid of an area because it is difficult to manage seems a major cop-out and a poor indication of BLM's management abilities. In fact, many other BLM districts would like to have lands as blocked-up as those you are proposing to get rid of because they are not blocked up enough! Looking at one of the few maps, we can not find 73,000 acres of isolated parcels. Not even close. Where are they really? Lands in Appendix 3 are large blocked areas by and large with thousands and thousands of acres per township. What does isolated mean to BLM? How many lands have been dropped from disposal or exchange because of significant resource values? We question what BLM believes significant resource values are? You do not ask the public when these land cases come up. From whom do you receive input?

Page 13. BLM should tell the public how it arrived at suitable and unsuitable areas. It seems the criteria (unstated in this plan) are arbitrary (as are the reduced boundaries) and without much sense since they change so much between alternatives. We believe that desert tortoise habitat in the Maricopa Mountains, for example should be protected through wilderness. Why not, since BLM does not give reasons one way or another? Wilderness is the Plan's only special management for important ecological areas. The plan avoids ACEC's or other special management areas.

Page 14. Table 2-3. How can disposal be the same in all the alternatives? Disposing of a net 26,000 acres of land can not be in the interest of Environmental Protection, for instance. BLM needs to explain this much more clearly. We can not tell where all these actions are to take place. The document does not allow us to analyze BLM's plan. A net loss of 26,000 acres is a significant impact requiring mitigation.

No Action. We see no significant difference between proposed and no action for livestock grazing issue. This is not providing a wide range of alternatives, required by CEQ guidelines.

Page 15. Resource Production. If the eight allotments mentioned here for AMP's do not fit BLM's improve category, then why would BLM improve them in this alternative? Perhaps categorization should change. As in the Proposed Action, new rangeland developments would increase livestock production in the short term. However rangeland productivity would decline. Rangeland developments would eventually increase the amount of lands in fair and poor condition since these are the practices that caused the existing fair and poor conditions--where

257-11

The draft RMP did not state that 73,123 acres were isolated or difficult to manage. Many of the identified lands do meet this criteria. Other lands meet the other criteria discussed in the document such as agricultural lands, public expansion areas, and areas where the State Land Department could better manage the lands under the goals and objectives of the State School Trust. Exchange and other disposal actions are fully publicized in the Federal Register and local newspapers and comments and input received on each case.

257-12

Acres of crucial tortoise habitat in the Maricopa Mountains WSA are identified for the Proposed Action Table 4-3, Resource Protection Table 4-14, and Environmental Protection Table 4-16. Under the Resource Production and the No Action no habitat would be protected. Impacts are identified on page 71 of the draft RMP. The human impacts on tortoise are also briefly discussed on page 62 of the draft. Presence of desert tortoise is considered a supplemental wilderness value in analysis of wilderness suitability.

- 257-13 The areas where disposal actions may take place are the same because there are no significant resource values known to exist. This is a constant that does not change by alternative. What does change by alternative is the number of acres and location of land to be acquired for wildlife, wilderness, and other resource values. The whole Land Tenure Adjustment issue needs to be considered, not just the disposal aspect of this issue. That 73,123 acres have been identified for disposal does not mean that all 73,123 acres will be disposed of. This quantity of land is necessary to have as an exchange base in order for us to be able to acquire those nonpublic lands that do contain significant resource values. There has to be a broad enough area offered in order to provide lands that would interest the state and private land owners and allow us to exchange for riparian lands, inholdings within WSAs, etc. Therefore, overall there will not be a loss of 26,000 acres of public lands.
- 257-14 CEQ requires a range of alternatives from no grazing to full production. The LGS RMP/EIS meets these requirements set by CEQ.
- 257-15 The fact that allotments are placed in M and C categories does not preclude them from AMPs in any of the alternatives. Also, allotments may be reclassified as additional data becomes available through the monitoring process.

257-16

forage was depleted.
This is the only alternative that would attempt to improve the Cameron Allotment, where endangered Sonoran pronghorns occur, through an AMP. We can not see why BLM would propose to fail to improve Sonoran Pronghorn range in the Proposed Action through some reasonable means. BLM is obligated to improve Sonoran pronghorn habitat under the Endangered Species Act. Other means than an AMP could be used also, such as change to ephemeral grazing, changes in season of use, reductions in livestock numbers, or cessation of livestock grazing. None of these means are considered or analyzed.

Page 16. Resource Protection. This alternative seems the only one that tries to fulfill BLM's mandate for multiple use and sustained yield of resources (the latter phrase seems forgotten from BLM's vocabulary). One thing lacking in this EIS is an alternative putting allotments in seasonal or ephemeral categories. Virtually all allotments in Lower Gila South produce only significant forage from annuals. They should be managed as such by BLM. Most allotments in that part of Arizona are run on a seasonal or ephemeral basis by the ranchers, but are given credit by BLM for having yearlong operations. This perpetuates a myth that the land sustains yearlong production, a myth that many of these are significant cow-calf producers, and a myth to lending institutions that many of these "ranchers" are running viable economic operations. BLM's economic analyses in this document show that most ranches are not viable economic operations. BLM's mission is for multiple use and sustained yield of resources, not perpetuating myths and allowing the desert ecosystems to continue to slowly deteriorate, causing wildlife extinctions in the long term.

Page 18 and others. No alternate protection or designation for WSA's is in the RMP. These areas are special and should be managed by BLM to protect their values. There is not presented a wide range of alternatives for managing these special areas. It is either wilderness or nothing.

Land Tenure Section. A resolution was unanimously passed by the Desert Tortoise Council in 1984 against the disposal of desert tortoise habitat. BLM said it would fully consider such values before exchange or sales would take place. Will BLM not get rid of desert tortoise or other valuable special species habitat? Explain this program in this EIS without glossing over the plans. One paragraph vague statements in each alternative does not explain to the public BLM's real specific intention. How are we readers to know?

257-17

Page 19 and others. Utility Corridors. There is no wide range of alternatives for utility corridors. They are all the same. What types of activities in the corridors are proposed and what types of stipulations would there be?

257-18

Communications Sites. There is no mention in the RMP. If no sites will be allowed this should be stated. Communications sites is an issue. A coordinated plan is needed for placement of such sites with full environmental participation and careful avoidance of significant areas, rather than unplanned, indiscriminant sloppy developments all over every peak, impacting desert bighorn, desert tortoise, and other habitats.

257-19

Allotment Categorization. BLM should do this with public and other

- 257-16 The impact from reduction of livestock numbers on Sonoran pronghorn is mentioned on page 80 of the draft. Impacts to pronghorn would be positive since it would alleviate forage competition between cattle and antelope.

The impact from cessation of livestock grazing on Sonoran pronghorn is addressed on page 84 of the draft.

- 257-17 For every disposal action, whether exchange, sale, R&PP etc., a Site-specific Environmental Assessment will be done. During this process and public comments solicited from the Federal Register and newspapers, special habitats will be assessed. This information will be used in the decision making process. The BLM will fully consider the values of Desert Tortoise habitat in this process.

- 257-18 The utility corridors that are proposed were formed around existing facilities and in locations that will provide necessary routes for utilities. This way much of the existing roads can be used and surface disturbance reduced. This idea does not change even when looking at different alternatives. The width of the corridors (1 mile) is what we feel is a minimum to properly place additional facilities. This width is far below the widths (3 - 5 miles) requested by industry, and this minimum width doesn't change by alternative. Uses within these corridors will include utility systems such as pipelines and powerlines. Stipulations will be developed for each project within the corridor.

257-20

agency (Arizona Game and Fish) input. This was certainly not done. The present categorization fails to look at multiple-use issues like soils, watershed, and wildlife. Criteria listed in Appendix 12 do not fit the way the allotments are categorized. There are conflicts with Sonoran Pronghorn, desert tortoise, bighorn, riparian habitats, and fragile desert pavement soils. These conflicts should put allotments into the improve category. Monitoring. "Selected" perennial-ephemeral allotments would be monitored. How is the "selecting" to take place? No special emphasis is stated on allotments with wildlife conflicts, including the 16 with heavy browse use.

257-21

Page 21. ORV use. BLM has given no rationale for not proposing ORV designations. Riparian areas, fragile soils mentioned in this plan, and crucial wildlife habitats should have designations. Without designations BLM is licensing indiscriminate abuse of our public lands through a long term (20 to 25 years) that would see ORV use at least double during that time. Areas such as the Eagletail Mountains are overrun now with ORV tracks wherever a vehicle can get. The scars are on the desert pavement for all to see. There is no evidence presented in the RMP that BLM has looked for ORV problems to rectify or if BLM intends to ever. Surely ORV use in Sonoran Pronghorn habitat or desert tortoise habitat is not neutral to these resources. Here the RMP is avoiding planning for resource uses on public lands.

257-22

Page 20. Land Tenure. The place to plan communications sites use and future use is in an RMP/EIS. Impacts of BLM's land use plan/policy are supposed to be analyzed here.

Page 22-23. Wildlife Program. Item Number 3. BLM should be consulting with the U.S. Fish and Wildlife Service because of the plan's impacts on the Sonoran Pronghorn. Item Number 8. Confusing statement. Should state Blading will not be done for fence building.

We suggest two more items. * Grazing restrictions will be placed on high browse use/crucial wildlife habitat allotments. * Domestic sheep will be kept out of allotments inhabited by Bighorn Sheep to avoid transmittal of disease.

257-23

Page 24. The only wildlife summary is impacts due to wilderness, not other issues. Even this summary is biased since it does not show acres not protected (dropped) for important wildlife.

Page 36. Affected Environment-Wildlife. Items discussed in chapter 3 should be carried through to Environmental Consequences, and vice versa. This is not done completely. Where is the Yuma Clapper Rail habitat (map)? Sonoran Pronghorn habitat, how much is there and where is it? Is habitat of the Threatened or Endangered or State species being affected by any of the issues or other impacting agents? Here is the place to say so. What is the habitat condition of the Sonoran Pronghorn and Yuma Clapper Rail.

Page 38. Table 3-5. Where and over how much habitat do these species occur? This is necessary so we, your public, can evaluate BLM's assessment of impacts and the plan. Add piecemealing of habitat, mineral development to desert tortoise threats. How many acres of habitat are there and where? Add urbanization to Mojave Desert

257-19 Communication sites are covered on page 20 of the RMP. Site plans will be developed on existing sites and will also be developed on proposed sites. Any new site would also go through the Environmental Assessment process to determine feasibility and required mitigation.

257-20 The management categorization establishes priorities for distribution of range improvement funds and the use of range personnel. Allotments in the "M" category would be managed to prevent serious conflicts with wildlife resources and prevent resource deterioration. "C" allotments are generally ephemeral or perennial-ephemeral allotments that are in an overall acceptable condition with no serious conflicts or are Section 15 allotments with small percentages of public land within their ranch boundaries. Also see response 257-8.

257-21 See Chapter 2, Management Guidance Common to All Alternatives Section on Recreation Off-road Vehicle Use.

257-22 Change made in final RMP.

257-23 Impacts to all wildlife species mentioned in the Affected Environment Section are addressed in Chapter 4 if they are significantly affected by actions in any of the alternatives. The analysis focuses on the impacts of management actions on the habitat of threatened and endangered species; whether these actions will improve, degrade or have no impact on the habitat. Detailed maps of Sonoran pronghorn and Yuma clapper rail were not done to avoid publicizing and attracting

additional human disturbance to these species.

Destruction of habitat by mining is an impact to tortoise addressed in Chapter 4, Environmental Consequences.

257-24

Fringe-toed lizard threats. Channelization of the Gila River is not discussed in Environmental Consequences or the Alternatives. Is this the Greenbelt issue? What does BLM have to do with channelization? The Gila monster probably does not significantly occur in all habitats. Add low prey density due to channelization, tamarix invasion, and overgrazing for the Accipiters.

257-25

Page 37. The greenbelt is discussed here, but not in the Environmental Consequences chapter. Should be consistent. Because it is an issue, there should be alternatives and environmental consequences sections on the greenbelt. How many acres of desert bighorn habitat are there and where? Where are the conflicts with other uses? Special management areas or ACEC's should be designated for crucial desert bighorn habitats. No discussion of conflicts with fences. Where do threats occur, so they can be analyzed later in the document. Mule deer. What are the conflicts between deer and other uses, like livestock. There is no discussion of any problems here. No mention is made of any conflicts in aquatic habitats, either.

Page 40. Table Top Mountains, Sierra Estrella Mountains, and Vekol Valley grassland should be special areas or ACEC's or natural areas. Any conflicts with these areas? This is the last place the Estrella Mountains are discussed in the document. Makes no sense. Will BLM retain ownership of these lands? Is the watershed-grass cover of Vekol valley in good condition? Is any special management needed? Where are these areas so we can see how they fit into areas covered by the issues?

257-26

Page 42-43. Desert Pavement. This section states impacts and conflicts. There will be more in the future. Why is there no planning in this document to handle this? No special management or mitigating measures are discussed. No restrictions on surface-disturbing activities? 150,000 acres are "...not suitable for livestock grazing..." why is BLM not proposing to take care of this? Sites of critical erosion are mentioned, also due, in part to heavy livestock use. No measures in the RMP to manage this.

257-27

Page 53. General Assumption Number 4. Throughout this document BLM fails to look at the long term socio-economic conditions affecting the public land. For instance, the population of the Phoenix-Tucson areas will at least double in the long term. This will at least double the pressures of recreation, ORV, mining, urban sprawl, etc. This knowledge is not used in the RMP/EIS.

257-28

Page 54. Wildlife. These should not be assumptions. They should be fact and should really be in the section on page 22 under management guidance, especially where Threatened or Endangered species are concerned. BLM does intend to take these three steps, correct?

257-29

Page 59. Mule deer conflict was not discussed in Chapter 3. All discussion of impacts to mule deer point toward adverse impacts, except for monitoring studies. Effects of monitoring studies are actually unknown and are, at best, speculation. This narrative conflicts with Table 4-2 (page 61) which indicates overall beneficial impact. Which is true? Evidence points to the narrative as being more likely. When

257-24 Mohave-fringed toed lizard is threatened by potential urbanization around Parker and Quartzite. Proposed land disposal was screened to insure that Mohave-fringed toed lizards did not occur on any parcels.

257-25 The Green Belt Issue is not analyzed in this document but will be addressed in a separate activity management plan. Channelization of the Gila River from 91st Avenue to Gillespie Dam was addressed in a 1980 environment assessment report authored by Benham-Blair Affiliates, Inc. Clearing along that stretch has been completed. BLM will be involved along with AGFD and U.S. Fish and Wildlife Service in addressing any future proposals.

257-26 The 150,000 acres of desert pavement soils produce very little ephemeral forage. These areas are not fenced and livestock make very little use of them. Livestock are in these areas for short periods of time and any damage to the desert pavement soils would be minimal. The fragile desert pavement soils are presently being monitored. Any proposed soil disturbances will contain stipulations to protect these soils.

257-27 Increased demands on resources from population growth was anticipated in the decision to prepare the RMP. Chapter 2 indicates that specific resource management problems will be resolved through the use of environmental assessments. This type of action will be used to resolve problems caused by population growth.

257-28 These assumptions are made to simplify the analysis. It is BLM policy not to initiate land exchanges which would have a significant negative impact on state-listed threatened species such as bighorn sheep and desert tortoise.

257-30

little data are present to definitively assess an impact, worst-case analysis is indicated under the CEQ guidelines. This has not been done here nor has it been done in the other alternatives. If domestic sheep grazing is permitted by BLM in allotments occupied by bighorn sheep, additional disease factors are present, but unaccounted for in this document. The narrative points out an overall adverse impact of the Proposed action, but not necessarily in Table 4-2. This table should be redone to fit the narrative.

257-31

Page 60. Sonoran Pronghorn would decline under the Proposed Action. BLM can not allow this under the Endangered Species Act. How can BLM have the gall to propose this? The narrative again disagrees with Table 4-2. The level of grazing management is not discussed in these sections, but is on the table 4-2. What does it mean? It does not appear accurate. Desert Tortoise. Again, the narrative shows adverse impact and points out specific impact areas, but does not agree with Table 4-2. This is another section requiring a worst-case scenario. Supposition on downward adjustments due to monitoring is a bad practice. Trampling impacts are not addressed. Wells and reservoirs would be precluded as stated on page 22. Again, BLM is proposing to let the desert tortoise decline further? Bear in mind the desert tortoise has been petitioned for federal listing for some of these reasons.

257-32

Page 61. The Grazing conclusion is negated by the narratives and the need for worst-case analysis. Wilderness issue. Adverse impacts of areas released from wilderness protection are not covered. How many acres of important habitats would be dropped and what would the areas be subjected to? There is no alternative stated for these areas other than wilderness. Why?

257-33

Page 62. Land Tenure. Most discussion of disposal points to adverse impacts, and does a good job, but the last paragraph under disposal says habitat loss would be minimal. From page 14, 73,000 acres-(11,000 to 37,000 acres)=36,000 to 62,000 acres of habitat lost. This is a great deal of habitat and it is significant. BLM fails to flesh-out fully the impacts of this issue. Acquisition. Although thousands of acres would be disposed of, no desert tortoise habitat would be acquired. Why? BLM's land tenure tact here is for a net large loss of public lands habitat. This is very poor sustained yield management.

257-34

Page 63. Utility Corridors. What will be the cumulative impact of having these full corridors fragmenting habitats and isolating populations throughout the EIS/RMP area? What standard stipulations and measures would BLM employ to ensure that as little habitat as possible is disturbed and that wildlife will be able to have access across these mile-wide areas? The corridor issue is incompletely and superficially analyzed in this plan, along with communications sites. Soils. Despite statements on pages 42+43, BLM proposes again to do nothing, and then says here that soils will not be significantly impacted. Which section is correct?

Page 71. Wildlife Conclusion-No Action. Rangeland Issue. Impacts would be the "...same as the Proposed Action..." because BLM plans no substantive action to correct any resource problems in the Proposed

257-29 Table 4-2 was developed based on the assumption that long term monitoring studies would point to the need for use adjustments on allotments exhibiting cattle/wildlife conflicts and that these reductions would be put into effect. A change in this assumption would also change the impact ratings for rangeland monitoring and level of management under all alternatives except No Action.

257-30 See Chapter 2 Management Guidance Common to Alternatives Wildlife Program - Specification 10.

257-31 BLM is proposing to monitor Sonoran pronghorn habitat and desert tortoise habitat and adjust livestock grazing based on long-term monitoring studies. This proposal is consistent with the Endangered Species Act and the Federal Land Policy and Management Act.

The conclusion is based on the assumption that monitoring studies will identify areas of conflict between livestock and wildlife and that adjustments in use will be undertaken.

257-32 Adverse impacts on bighorn sheep and desert tortoise habitat in areas released from wilderness protection are discussed fully in the Wilderness Supplement section of the draft RMP/EIS. It is our intention to reevaluate areas found to be unsuitable for wilderness designation to determine the need for establishing Special Management Areas (refer to Chapter 4, General Assumptions for Analysis in the Final RMP).

Action.

Page 73. Impacts on vegetation. What substantive evidence does BLM have that downward trend would solely "...be reversed or stabilized with the construction of new...developments..." unless these developments were exclosures. We feel this is an inaccurate assessment of the vegetation.

257-35

Impacts on Wildlife. Rangeland Issue. Which allotments have desert tortoise and bighorn sheep habitat? How many acres could improve compared to the total acres of habitat in the RMP area? Is this a significant impact? We can not see how an assessment could be made without going through these steps.

Wilderness Issue. Again, no alternatives to wilderness. No mitigating measures. Just all or none. This is not good planning or good, balanced resource management.

Page 78. Caption. There are plenty of ways to protect the desert tortoise that are not chosen in the alternatives. Monitoring does not seem very likely to protect the desert tortoise, contrary to the caption. Though we are not told in chapter 3 how much crucial desert tortoise habitat there is, of the at least 46,000 acres (Environmental Protection Alternative-Wilderness), the proposed action would protect less than one fourth of that habitat. That is not much conservation, protection, or sustained yield.

257-36

We strongly suggest in crucial desert tortoise habitats:

1. Limit Off Road Vehicle use to designated roads and ways.
2. Grazing use should be very carefully controlled to ensure sufficient forage foremost for the desert tortoise and minimize possibilities of trampling.
3. Withdraw crucial desert tortoise habitats from mineral entry and restrict leases with no surface occupancy stipulations.
4. Minimize intensive recreation use of the habitat.
5. Allow no range improvements in desert tortoise habitat that would attract livestock.
6. Allow no surface-disturbing activities in desert tortoise habitat.
7. Dispose of no crucial desert tortoise habitat. Acquire additional habitat.

Page 80. Resource Protection. This is the only alternative that takes a balanced effort at managing resources and their uses on a sustained yield basis. Compared to the unlikelihood of the Environmental Protection Alternative, this is the best one overall.

Rangeland Issue. This is the only alternative that attempts to resolve grazing conflicts in a balanced manner.

Wilderness Issue. There is still need for special management to protect resources in the non-designated WSA's.

Why are there no mitigating measures proposed in this document? There certainly is great need for mitigation of BLM's planning.

257-37

Page 272. Percentages of acreages in the four condition classes do not add up to 100.

In summary, the draft RMP/EIS fails to recognize, through management proposals, the special wildlife values within Lower Gila South and to balance multiple use and sustained yield with the protection of important desert ecosystems. It fails to look at the worst-case scenario when the situation is warranted, and fails to provide a wide range of alternatives to deal with the issues. The RMP/EIS also fails to deal with all the issues extant in the area.

Thank you for the opportunity to comment on this document.

Sincerely,

Daniel C. Pearson

Daniel C. Pearson
Senior Co-Chairperson

258



BRUCE BABBITT
Governor
CHARLES L. MILLER
Director

ARIZONA DEPARTMENT OF TRANSPORTATION

HIGHWAYS DIVISION

206 South Seventeenth Avenue Phoenix, Arizona 85007

April 26, 1985

W.O. FORD
State Engineer

Mr. Marlyn V. Jones, District Manager
Bureau of Land Management
Phoenix District Office
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Re: Draft Lower Gila South Resource
Management Plan/Environmental
Impact Statement

Dear Mr. Jones:

Thank you for the opportunity to review and comment on the Draft Lower Gila South RMP/EIS. The following comments have been coordinated through our District Engineer, Right-of-Way Section, Materials Section, and Transportation Planning Division.

The state highway system does not appear to be impacted by the proposed action. Projects on the Arizona 5-Year Construction Program within the counties of Maricopa, Pima, La Paz and Yuma will not be affected by the proposed action. Standard highway maintenance and drainage work would not be affected.

The Land Tenure Adjustment proposals may affect ADOT in terms of future right-of-way acquisitions. As ownership transfers to the State or private concerns the cost to ADOT for acquisition is likely to increase. The designation of utility corridors along state highways should not impact the highways. The one-mile width of the corridors should be sufficient to limit encroachment on the highways.

The wilderness proposals for the New Water Mountains, Eagletail Mountains, Woolsey Peak, and Table Top Mountains will not affect state highways. The boundaries of the New Water Mountains WSA and Table Top Mountains WSA south of Interstate 10 and Interstate 8 respectively are sufficiently drawn back to eliminate any conflicts with highway maintenance or drainage work.



HIGHWAYS • AERONAUTICS • MOTOR VEHICLE • PUBLIC TRANSIT • ADMINISTRATIVE SERVICES • TRANSPORTATION PLANNING

257-33 The acreage proposed for disposal consists largely of creosote-bursage habitat which is of low value for bighorn sheep, desert tortoise and mule deer. Some palo-verde mixed cacti habitat adjacent to now-developed land would be disposed of under the proposed action but these parcels were judged to be not crucial for these species.

The 2,200 acres of desert bighorn habitat proposed for acquisition also contains low density populations of desert tortoise, less than 25 individuals per square mile. Most crucial tortoise habitat in LGS is public land.

257-34 Cumulative impacts of a "full" corridor should not be any greater than the impacts caused by the current existing facilities.

257-35 All allotments contain some desert tortoise or desert bighorn sheep. It can not be ascertained how many acres would improve or what the degree of improvement would be. This depends on the results of long-term monitoring studies followed by adjustments in livestock use to reduce conflicts.

257-36 These recommendations will be analyzed as part of the LGS habitat management plan.

257-37 Thank you - the table has been corrected in the final.

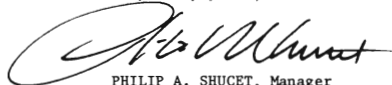
Mr. Marilyn V. Jones
Page 2
April 26, 1985

258-1

Additionally ADOT supports non-designation of the South Maricopa Mountains WSA as its boundaries currently exist. The 13.5 mile southern boundary which abuts I-8 right-of-way combined with the utility corridor proposed along I-8 could affect our ability to maintain the roadway. The numerous drainage crossings in the area often require upstream maintenance, and the placement of a new utility line could encroach upon the interstate.

If ADOT Environmental Planning Services can be of any assistance please contact Mike Dawson at 255-8638.

Very truly yours,



PHILIP A. SHUCET, Manager
Environmental Planning Services

PAS:MRD:kj

cc: Don Smith, District III Engineer
Bob Darr, Transportation Planning
Jerry Hogan, Right of Way

Response - Letter 258

258-1

BLM is not recommending the South Maricopa Mountains WSA for wilderness under the Proposed Action. Congress could still designate all or a portion of the area as wilderness. Congress traditionally has used a 300-foot setback standard (from centerline) for wilderness boundaries along existing high standard paved roads. This setback may not be sufficient in this case to satisfy ADOT maintenance requirements.

In order to inform Congress of conflicts between wilderness and upstream drainage maintenance, BLM will address and analyze such impacts in the final Lower Gila South Wilderness EIS. Congress will have this information before enactment of any wilderness legislation involving the South Maricopa Mountains WSA. Congress has full discretion on wilderness boundary placement. Congress could choose to: 1) not designate the area as wilderness; 2) designate the area with its present boundary configuration; and 3) modify the boundary to avoid impacts to highway upstream drainage maintenance.

259

1277 So. Prospector Rd.
Apache Jct., AZ 85200
April 30, 1985.

District Manager
Bureau of Land Management
Phoenix District Office
3015 W. Deer Valley Rd.
Phoenix, AZ 85027

Mr. Jones.

Recently we noticed a letter in the editorial section of the Arizona Republic that indicated areas designated wilderness are roadless. We knew that wasn't true because we have seen areas used by four wheelers, hunters, and nature lovers of all sorts, closed to our use even though the area had miles of roads. Now we find in this draft the term roadless is by your definition.

We, as four wheel drive users, object also to your definition of off road use. The term "off road" meant off the paved or maintained roads, to use forest service roads, old mining roads etc, not ~~your~~ your definition - over land -. We are trying to eliminate the term "off road" because of the new definition, to use the term four wheel drive which more adequately describes our use.

We are not interested in driving across a meadow, or making a "new road" up a mountain. What we enjoy is finding an old mining road or forest service road that requires four wheel drive, following that road and enjoying the serenity and peace found in nature.

We realize there are those that abuse the rights we all should have - free use of our national forests. Those kind of people - the abusers - are found in every group. Please don't let those few ruin every one else's rights.

William A. Mikhailov

Amy Mikhailov

Bill & Amy Mikhailov
1277 S. Prospector Rd.
Apache Jct., AZ 85200

3/8/85 11:15 AM
MAY 1 1985
BUREAU OF LAND MANAGEMENT
PHOENIX DISTRICT OFFICE
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260



EAGLETAIL RANCH

BILL O'BRIEN
PHONE: (602) 840-6072
RANCH: (602) 372-4619

April 22, 1985

District Manager
Bureau of Land Management
Phoenix District
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Gentlemen:

We recently have seen the draft resources management plan for the lower Gila South planning area. I would like to comment that your map No. 3-3 "Eagletail Mountains" fails to pinpoint or indicate the location of our mining claims. The area covered by our claims includes a 40 ft. cistern, two graves, three grottos, a deep lateral shaft and several work areas. Please include these claims in your future studies. They are all located approximately in S17x10W GSRBM. The area is not surveyed. These mines are named as follows and were filed December 30, 1983.

Frenchman No. 1
Frenchman No. 2
Frenchman No. 3
Frenchman No. 4
Frenchman No. 5
Frenchman No. 6

Sincerely,

E. L. Hays
E. L. Hays

263

DAVID M. BAND MD.
PO Box 368
Kaysville, AZ 86033
30 April 1985

Phoenix District BLM
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Please support wilderness recommendations for
White Canyon, Mt. Wilson, Coyote Mountains,
Pinto Gulch Peak (include 324 acres of
contiguous site land acquired by BLM), Little Canyon,
Piedra Blanca, Little Horn Mountains, Little Horn Mts.,
Signal Mt., North Montezuma Mts., Butler Peak, Stage Mountain,
Tobacco Mts., Woodbury Peak, New Water Mts., Eagle Mts.,
East Clinton Mts., Face Mts. & Sandy Mountains Mts.

These areas in the Phoenix EIS & Lower Gila South
are one of the most beautiful spectacular scenic
areas.

Please support their total preservation - wilderness
Thank you. David M. Band MD.

COMMENTS AND RESPONSES

262



ARIZONA WILDLIFE FEDERATION
4330 N 62nd St. #102 • Scottsdale, AZ 85251 • (602) 946-6160

ACE PETERSON
President



May 1, 1985

District Manager, Bureau of Land Management
Phoenix District Office
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Subject: Lower Gila South Draft Resource Management Plan/Draft Environmental
Impact Statement

Gentlemen:

Thank you for furnishing a thorough, intelligible document with a cogent analysis of the issues.

We urge you to adopt a Resource Management Plan based on the Resource Protection Alternative. This alternative offers the best balance between maintaining and enhancing wildlife habitat, and the other potential uses of the area.

Rather than to belabor all of the generally positive ramifications for wildlife of the Resource Protection Alternative, which are shown clearly in the E.I.S., let us point out areas of our special concern:

The inclusion in the Resource Protection Alternative of an additional 94,080 acres, beyond that recommended in the Proposed Action, of "crucial" Desert Bighorn Sheep habitat under the protective umbrella of Wilderness designation is particularly important to the continuing welfare of this species. The values of viable populations of Desert Bighorn Sheep are inestimable, whereas the value of the forage resource as it may be used for cattle growing is negligible, and the value of metallic minerals and fossil fuels that may exist within the affected WSA acreage is dubious.

The "significant beneficial impact" on Desert Tortoise populations arising from Wilderness designation of 7,050 more acres of "crucial" Desert Tortoise habitat in the Resource Protection Alternative versus the Proposed Action should be given due consideration.

The 47% reduction in grazing levels proposed by the Resource Protection Alternative will have "a significant long-term benefit for mule deer", and will "significantly benefit" Sonoran pronghorn on the Cameron allotment, as well as producing ancillary benefits for many other wildlife species by reducing competition with cattle.

We specifically object to the rangeland developments as proposed in the Proposed Action. The further dispersal of cattle over the range will have largely negative

impacts on a variety of wildlife, particularly Desert Bighorn Sheep (via increased stress and disease transmission from cattle to sheep), as well as mule deer, Desert Tortoise, and Sonoran pronghorn (via increased competition for forage). We urge you to mitigate the impacts of livestock grazing as they affect wildlife habitat by both reducing allotted AUM's in sensitive areas, and by restricting livestock to no greater areas than those presently in use.

Thank you for inviting and considering our comments.

For the Arizona Wildlife Federation

John K. Calkins
Greenlee County Director

JKC/sv

cc: Bud Bristow, Director, Arizona Game & Fish Department
Chris Jennings, Director, Arizona Game & Fish Commission
Dean Bibbes, State Director, Bureau of Land Management
Arizona Wildlife Federation File

Apr. 28, 1985

M. McWhiney
2007 E. Rancho Dr.
Phoenix, AZ 85016

To whom it may concern:

We are writing to support the all wilderness alternative in the Lower Gila South Draft Environmental Impact Statement. After visiting several of the areas ourselves and talking with people who had knowledge of the other areas and viewing numerous slides of the areas ~~all~~ all of the areas seem to be essentially natural and offer outstanding opportunities for solitude and primitive and unconfined recreation.

The Little Horn Mountains and Little Horn Mountains West WSA's offer a wide variety of volcanic features throughout their range providing needed habitat for numerous species of plants and animals including desert tortoise and desert bighorn sheep. Both of these areas have exceptional wilderness values.

Signal Mountain WSA ~~has~~ has beautiful, rugged terrain with many scenic vistas and meets all other wilderness criteria easily.

East Clanton Hills WSA deserves protection. The area has excellent wilderness characteristics. The EIS states that manageability would

be a problem because of poorly defined boundaries, mineral potential and less desirable wilderness qualities. The sparseness of vegetation in Hyder Valley ~~provides~~ provides a different, albeit harsh wilderness experience but not necessarily a less desirable one. The boundaries along the western and southern end seem somewhat arbitrarily drawn and something should be done to alleviate the problem other than dropping the area. The wilderness characteristics of the area outweigh any potential mineral deposits that might be in the area.

Face Mountain WSA provides all of the characteristics for both solitude and primitive unconfined recreation. It is isolated, has a beautiful desert landscape, and provides habitat for many species.

The BLM should be commended for recognizing the wilderness characteristics of Table Top Mountains, Wadsey Peak, New Water Mountains, and Eagletail Mountains WSA's but should include all of the acreage in the ~~WSA's~~ WSA's in their proposal. This will enhance the areas already outstanding characteristics.

The North Maricopa Mountains, Butterfield Stage, and South Maricopa Mountains WSA's all offer

③

superb wilderness values and should be designated wilderness. We have examined much of the three ~~units~~ units on foot and by car and found the opportunities for solitude and primitive, unconfined recreation to be exceptional.

There are numerous large washes which wind through the units and provide natural routes for a wide variety of activities including hiking, backpacking, photography, hunting, geologic study, historical study and nature study to name a few. The impacts of the wildlife catchments, ranching improvements, and vehicle intrusion are minimal. We found evidence of bighorn sheep throughout the mountainous areas of the units. These units will provide necessary protection for the bighorn and other sensitive species, from encroachments of the Phoenix metropolitan area which will increase greatly in the years to come.

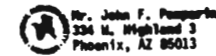
These areas will also protect an abundance of cultural remains, from prehistoric rock shelters to a portion of the ~~Butterfield~~ Butterfield Stage route one of the most prominent, important routes used in the history of the United States.

The Bureau should look into trading out

④

the present ~~mineral~~ mineral inholdings in the areas for other mineral rights elsewhere in the BLM's inventory. We visited all but a few of the ~~cherry~~ cherry stem "roads" in the areas and found that only two, the road into ~~Hazen Well~~ Hazen Well in Margies Cove as far as Hazen Well ~~and~~ in the ~~the road~~ North Maricopa and the road separating the North Maricopa WSA from the Butterfield ~~and~~ Stage WSA only as far as Happy Camp, ~~could~~ could be called roads because none of the other "roads" had the appearance of having been maintained. The road to Hazen Well and Happy Camp had, ~~but~~ it appeared, been bladed recently. The rest of the "roads" we traveled on were passable only to a high clearance vehicle and much of the time were just two ruts in the earth to follow.

We feel that the ~~cherry~~ cherry stem roads ~~other~~ other than the two mentioned above and possibly ones which we did not travel, are actually vehicle ways and should be closed to vehicle entry if and when the areas become wilderness, with possible exceptions granted



for continued maintenance of the water catchments and range improvements in the areas.

We also feel that the road into Happy Camp on the Butterfield Stage route ^{should} be cherry-stemmed and the North Maricopa Mountains WSA and Butterfield Stage WSA should be joined to form one unit.

All of the units mentioned in this letter deserve wilderness protection. We need to protect what little remains of our natural environment in an undisturbed setting.

Sincerely,

KEN BUNCH

2707 E. TURNKEY AVE

PHOENIX, AZ 85016

Matt McWenke

2007 E. Rancho Dr.

Phoenix, AZ 85016

RECEIVED
BUREAU OF LAND MANAGEMENT
PHOENIX, ARIZONA
JUN 10 1988

Mr. District Manager:

As a member of the Sierra Club, Audubon Soc. and numerous other environmental organizations, I would like to take a minute to give my opinion on the Lower Gila South Resource Management Plan & DEIS.

After reviewing the Proposed Action and the 4 Alternatives, I find that I must support the Environmental Protection Alternative.

I feel the Proposed Action is fairly good at addressing the issues except for the wilderness designation of only 189,750 acres. While 607,557 acres may be a little more than is actually necessary, the amount proposed by the PA is not nearly enough.

The adverse effects on the ranchers in the area will be great under the Environmental Prot. Alt., but I think the benefits to the wildlife and vegetation will make it worth it in the long run.

So I will support the Environmental Protection Alt. as the best way of dealing with the issues for the lower Gila South area.

Thank you,

Sincerely,
John Pamparini

267

APRIL 29, 1985

GIVE US SOMETHING TO LOOK AT IN THE FUTURE

IT'S A HARD THING THAT A GOVT. AGENCY MUST PROTECT OUR OWN LAND FROM THE GREED OF OURSELVES BUT OUR AMERICAN RECORD HAS PROVEN WELL PROVEN THAT OUR INSSENSITIVITY TOWARD THE RESOURCES OF THE PLANNED EARTH IS A ONE-WAY DEAD-END AMBLY. I AM IN SUPPORT OF

THE WILDERNESS RECOMMENDATIONS FOR ALL THE WESTERN STATES BUT PARTICULARLY TO THOSE UNDER THE CONSIDERATION OF YOUR OFFICE.

NEAR THE BABQUINIA PEAK, AND ALPINE MOUNTAINS, AND MT. WILSON, AND LITTLE JUAN MTS., AND THE MATICOFF MOUNTAINS AND WORSEY PEAK AND THE TABLETOP MOUNTAINS AND SINGER MOUNTAIN AND NEW UNITED MOUNTAIN. PLEASE DON'T SELL US DOWN THE RIVER. R. SCOTT 8220 N 22ND ST PHOENIX AZ 85020

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GOLD FIELDS MINING CORPORATION
A Consolidated Gold Fields Group Company

Please reply to the address indicated.
200 Union Boulevard—Suite 500
Lakewood, Colorado 80228
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New York, New York 10169
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Telecopier (212) 880-5191

May 1, 1985

Ms. Marlyn V. Jones, District Manager
Bureau of Land Management
Phoenix District Office
2015 West Deer Valley Road
Phoenix, AZ 85027

re: Comments on the Lower Gila South Draft Resource Management Plan and Environmental Impact Statement

Dear Ms. Jones:

In reading and evaluating the various alternatives for the 12 Wilderness Study Areas (WSA's) in the Lower Gila South Planning Area, I find that fair and careful consideration has been given to the issues discussed in the Draft RMP/EIS. I am pleased that the BLM Proposed Alternative recommends portions of four WSA's (189,750 acres) as suitable for wilderness rather than all of the 12 WSA's (607,557 acres). This certainly indicates that the multiple use concept of the WSA's was given proper consideration. The issues are difficult and require a great deal of thought and intelligent planning.

Before commenting specifically on the alternatives, I would like to point out that Gold Fields Mining Corporation and several other major and junior mining companies are conducting extensive precious metal exploration programs in the Lower Gila South Planning Area. Gold Fields and, to the best of my knowledge, our competitors are conducting their reconnaissance and drilling programs with a minimal impact on the environment. This is done for two very practical reasons: 1) we all are required to do so by law; 2) each company does not want to leave tracks for their competitors.

Mineral entry and exploration, including drilling, can be accomplished with very little impact on wilderness values, historical and archaeological sites, and wildlife habitat. A relevant example of minimal adverse impact is given by a recent helicopter supported drilling program conducted by Gold Fields within the Indian Pass WSA, located about 20 miles northwest of Yuma, Arizona, in the California Desert Conservation Area. The two reverse circulation drill rigs which operated for about two

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ARIZONA MINING ASSOCIATION

C. J. HANSEN
President

May 1, 1985
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Page Two

weeks were very closely monitored by the BLM, El Centro, California, office. The BLM was satisfied to the extent that Gold Fields' Indian Pass WSA drilling program will be used as the standard for any future drilling operations within a WSA in the CDCA.

The No Action or Resource Production Alternatives are preferable from a mineral entry and exploration standpoint in that multiple use would continue under current regulations. The Proposed Action would essentially prohibit mineral entry in four of the twelve WSA's, the New Water Mountains, Eagletail Mountains, Table Top Mountains, and Woolsey Peak. All four of the WSA's contain large areas in which significant locatable mineral and geothermal potential exist. For example, modest mineral production occurred in the northern New Water Mountains in the 1930's and 1940's. Numerous pits, shafts, and adits near Twin Peaks and Gunsight Notch indicate significant base and precious metal resources may be present. Table S-4 on page 129 of the Draft RMP/EIS rates the mineral potential of the Eagletail and Table Top Mountains as high while the New Water Mountains and Woolsey Peak WSA have been rated as having medium mineral potential. Other areas in the Basin and Range Province which are rated as having a medium or low mineral potential contain significant economic mineral deposits. The initial lower rating of many areas is based on limited information. The geologic setting in the New Water Mountains and in the Woolsey Peak WSA indicates that the mineral potential of both areas is as high as in the Eagletail and Table Top Mountains.

I reiterate that mineral entry and exploration can be and is accomplished with minimal adverse impact on the environment. Current regulations are more than adequate to protect water quality, scenic values, and wildlife habitat.

Thank you for your consideration of these comments. I am confident that the concerns of the minerals and energy industries will be given proper consideration in your planning.

Sincerely,

Rick H. Russell
Exploration Manager
Southwest/Rocky Mountain Region

RHR:csg

May 5, 1985

Mr. Marlyn V. Jones
District Manager
Bureau of Land Management
2015 W. Deer Valley Road
Phoenix, Arizona 85027

Dear Mr. Jones:

Enclosed are the comments of the Arizona Mining Association regarding the Bureau's Lower Gila South Draft RMP/EIS.

The Arizona Mining Association represents 15 of the major mining companies that produce most of the copper, molybdenum, gold and silver in Arizona. These comments resulted from a compilation of data determined by previous field examination of properties in or near the areas proposed for restricted access. Hopefully this information will aid you in arriving at a final Resource Management Plan that will continue the multiple use of public lands in the area.

Sincerely,

R. J. Pursley
Executive Secretary

RJP/jc
enclosure

THE COMMENTS OF
THE ARIZONA MINING ASSOCIATION
ON THE
BUREAU OF LAND MANAGEMENT
LOWER GILA SOUTH
DRAFT RESOURCE MANAGEMENT PLAN/
ENVIRONMENTAL IMPACT STATEMENT
PHOENIX DISTRICT, ARIZONA

Introduction

The Arizona Mining Association has developed these comments to generally show the concern for mineral potential within the Bureau of Land Management's Lower Gila South, Phoenix District that is being studied for wilderness designation. The Arizona Mining Association consists of 15 major mining companies in Arizona that produce most of the copper, gold, silver and molybdenum in the State. The Association, as well as the aware public and the mining industry, are concerned about the continuing actions of the federal government to remove and restrict public lands from productive use prior to a thorough evaluation of the mineral potential of the areas being withdrawn.

Cumulative Effect of Withdrawals in Arizona

The Arizona Mining Association is extremely concerned about the continuing actions of the federal government to remove and restrict public lands from productive use. Approximately two-thirds of all public lands in the United States are now effectively withdrawn from mineral development. In Arizona, existing wilderness areas total two million acres and it has been determined that approximately 30 million additional acres (two-thirds of the Federal lands in Arizona) are unavailable or highly restricted to mineral resource development by other withdrawals including BLM Wilderness Study Areas, Forest Service Wilderness Study Areas, Primitive Areas, Scenic Areas, Game Preserves and Refuges, Parks and Monuments, Defense Department withdrawals, Indian Reservations and numerous other withdrawals. Each of these categories has been formed by individual withdrawal actions with little or no consideration to the cumulative effect of all withdrawals in Arizona. The Association feels this cumulative effect must be addressed and considered in this EIS.

Lower Gila South RMP

The draft Lower Gila South Resource Management Plan and Environmental Impact Statement has been reviewed by the Arizona Mining Association primarily to identify those proposed land management actions that would withdraw lands from mineral entry or otherwise restrict mineral development. Listed below are the major management decisions which would have an impact on mineral development.

The draft Lower Gila South RMP recommends under its proposed action as suitable for wilderness a total of four WSAs comprising 189,750 acres in the New Water Mountains, Eagletail Mountains, Woolsey Peak and Tabletop Mountains WSAs. It is commendable that the RMP recommends that those WSAs not designated as suitable for wilderness should be released from wilderness review and managed under the multiple resources concept. However, the Arizona Mining Association contends that the RMP did not give adequate consideration to potential mineral development in the decision to recommend the four WSAs as suitable for wilderness. Table S-4 on page 129 of the RMP lists the mineral potential and mineral development potential for each WSA. Only three WSAs were rated as having high mineral potential, yet two of these areas, the Eagletail Mountains WSA and the Tabletop Mountains WSA, were recommended as suitable for wilderness. Only one of the WSAs was recommended as having high mineral potential development and this area, the New Water Mountains WSA, also was recommended as suitable for wilderness. It is the Association's position that these areas should be seriously considered for deletion from wilderness recommendation as a result of their mineral potential.

Additionally, each of the four areas recommended as suitable for wilderness are comprised primarily of creosote-bursage habitat and palo verde-mixed cacti habitat, with some ironwood. According to Table 3-3 at page 35 of the RMP, there already exists five statutory wilderness areas comprised of creosote-bursage vegetation type totaling 344,217 acres, three other creosote-bursage vegetation areas comprising 430,150 acres have been administratively endorsed for wilderness, and there are 48 creosote-bursage vegetation type WSAs totaling 1,401,259 acres. Also, there are four existing statutory wilderness area of palo verde-cactus shrub vegetation type totaling 265,450 acres, three other palo verde-cactus shrub vegetation areas totaling 847,600 acres have been administratively endorsed for wilderness, and there are 41 palo verde-cactus shrub vegetation type WSAs totaling 1,396,142 acres. Because the vegetation types in the proposed wilderness areas within the Lower Gila South Planning Area are already well represented in the wilderness system, it does not seem appropriate to designate more of these areas as wilderness.

Arizona: Mineral Storehouse

Arizona is a mineral storehouse and plays a significant role of meeting the nation's mineral needs. For many years, Arizona has been the premier metal producing state in the nation, and Arizona's mining industry produces two-thirds of the nation's newly mined copper, one-quarter of the nation's

molybdenum, one-fifth of the nation's silver and over one-tenth of the nation's gold.

Not only is Arizona the mainstay of the nation's mineral storehouse now, it also will be relied upon heavily in the future to provide a large portion of the United States' copper, molybdenum, silver and gold. The U.S. Bureau of Mines has reported that Arizona contains 85% of the United States' copper reserves and 20% of its molybdenum reserves, as forecast well into the 21st century. As a result, the State will play a significant role of meeting the nation's mineral and energy independence goals in the future and it is expected that mining will continue to be a prominent force in the future growth of the State's economy. However, discovery and development of many of these resources is dependent upon access to federally-controlled lands (70% of the State) where these minerals often occur. And unfortunately, minerals in Arizona have seldom received serious or timely consideration in land use planning.

A large number of small past producing mines and mineral prospects have occurred in or near the wilderness study areas considered in the Lower Gila South Draft RMP/EIS. A common exploration technique for copper, gold and silver has been in use for the past three decades: evaluation of areas of high concentrations of small mines and prospects. Up to this time, all major copper ore bodies in Arizona, except for ASARCO's Sacaton Mine near Casa Grande, reflect the results of thorough and sometimes deep exploration of areas where mineralization in numerous small mines were already known to exist. In some instances, old mining districts hold a high probability of having a deep buried "heart" of copper ore somewhere within or near them. The same criteria has and is being utilized in exploring for major gold and silver deposits.

Recent technological breakthroughs in the processing of low-grade gold and silver ore through particle agglomeration and heap leaching have made these methods attractive alternatives for many small gold and silver deposits and prospects. Some low-grade gold and silver ores, old mine dumps and tailings previously regarded as uneconomic can be profitably developed using agglomeration pre-treatment and heap leaching. This is the process whereby clay and silt-size particles are made to adhere to larger particles or made to accumulate into larger particles by the addition of moisture and usually a cementing agent through the application of some form of mechanical action. Cost comparisons with conventional processes show agglomeration and heap leaching to have a lower capital cost, a lower operating cost and a significantly higher discounted cash flow rate of return (DCF-ROR) than most other previously considered extraction processes for small mines and mineral prospects.

Beyond distinct economic advantages, gold and/or silver agglomeration and heap leaching require less lead time for production, offer greater design flexibility and have major environmental advantages. These and other attributes of the processes have been confirmed by rapid acceptance and utilization of agglomeration and heap leaching throughout the United States' precious metal mining industry.

Most of the high-grade deposits of gold and silver in the western United States were mined out by the 1930s. Thus, when the price of gold dramatically increased in the mid-1970s, the industry sought methods of economically developing lower grade deposits and reprocessing tailings from mills which treated higher grade ores. Heap leaching of these materials using cyanide and a lixiviant gained wide acceptance in the industry and proved, at least in some cases, to be a viable alternative to conventional milling and agitation leaching.

Most of the testwork which led the mining industry to use heap leaching was done by the U.S. Bureau of Mines at its Metallurgical Research Center in Reno, Nevada. The first major full-scale use of heap leaching of gold ore began in 1977 at the Smokey Valley Mine in Round Mountain, Nevada. Following Smokey Valley's example, a number of smaller gold-silver heap leach operations were initiated in the late 1970s mostly in Nevada and Arizona. More than half of these projects proved to be economic failures, due to poor metal recovery resulting from permeability problems in the ore heaps. As a result, the U.S. Bureau of Mines began research in 1978 to improve and sustain heap leach ore permeability. These efforts resulted in the development of the new particle agglomeration pre-treatment technology.

Precious metal producers in the United States quickly recognized the merits of agglomeration pre-treatment for heap leaching. In addition to a number of smaller operations, the process has been successfully applied by Tombstone Exploration, Inc. at their silver mine in Tombstone, Arizona. This was a past producer (State of the Maine Mine) that is similar in size to many of those gold and silver mines within and immediately surrounding the Lower Gila South area. As a result of the above developing technology, the Arizona Mining Association believes that many of the past producing small mines and mineral prospects in the Lower Gila South area may be economically viable mining projects that can be undertaken by both large companies and small groups of entrepreneurs in the near future.

Mineral Occurrences within the Lower Gila South Area

Base and Precious Metals

Arizona ranks second in the nation in the annual production of silver and fourth in the annual production of gold. The major economic development and cultural growth which occurred in Arizona since the Gadsden Purchase of 1853 and since it became a territory in 1863 can be directly attributed largely to the natural wealth of mineral resources, especially gold and silver, that abound in the State. It was the discovery of placer gold deposits, beginning in 1857, along the Lower Colorado River that attracted prospectors to the Arizona region in large numbers. It started with the Gila City placers about 20 miles east of Yuma and a series of gold rich placers that were located north of Yuma between 1861 and 1864. About the same time, gold placers were discovered near Lynx Creek and at Weaver Gulch and Rich Hill in Yavapai County. Mining operations also began in 1863 at the rich gold deposit of the Vulture Mine which started the town of Wickenburg.

Due to the meteoric rise in the price of gold and silver since 1978 a number of gold and silver mines have reopened in Arizona. Most notable gold deposit is the Congress Mine operated by Congress Consolidated Gold Mines in Yavapai County. Additional small past-producing gold mines are expected to reopen as a more favorable economic climate develops. Additionally, the mineral community is excited by the recent information that a large low-grade gold deposit has been identified 15 miles northwest of Phoenix. As a result, exploration activity is expected to increase in this area for this type of gold deposit. The Association realizes that the dropping price of gold and silver substantially impact on this exploration and development potential. However, this is a short lived phenomena and when prices recover exploration activity will increase.

A number of silver mines also have reopened in Arizona since 1978 and many other mines with significant past production are being re-evaluated. Recent reopened mines include Gunslinger, McCracken, Silver Cross, Contention, Blue Top, State of Maine and Ash Peak.

With a number of recent gold and silver discoveries and mine developments occurring near the California-Arizona border such as the Picacho, Potholes, Fortuna, Mesquite and Cargo gold deposits and the silver deposits of Sheep Tanks and the Silver District near the Imperial National Wildlife Refuge, the Association believes we can ill afford to withdraw or restrict the lands within the Lower Gila South area prior to a thorough mineral evaluation. As Joe Wilkins, Jr. of St. Joe American

Corporation states in his treatise on The Distribution of Gold and Silver-bearing Deposits in the Basin and Range Province, Western United States, "the overall spatial and temporal distribution of (gold and silver) deposits within the Mohave Block (in which the Lower Gila South area occurs) may not represent an absence of mineralization or an inadequacy of other geologic contents, but may be artificially induced by the vast tracts of lands withdrawn from mineral entry." (See Figures 1 and 2, and Table 1.)

New Water Mountains 2-125 (See Figures 3, 4, 5, 6, 7, 8)

This WSA is near Quartzsite and contains 40,375 acres of public land, of which 24,120 acres are designated in the RMP as suitable for wilderness. The WSA is rated as having medium mineral potential and high mineral development potential. p. 129. Although the area proposed for wilderness deletes some of the areas likely to contain mineralization, many of these areas, along with an area likely to contain geothermal resources, remain within the area designated as suitable for wilderness. The RMP states that the Laramide rhyolitic volcanism in the WSA produced many areas of gold and silver mineralization. Lead, copper, zinc, manganese and molybdenum also are present in many of the mineralized zones (Figure 6). The RMP also identifies the existence of deposits of sheelite, the potential for perlite, and outcrops for marble have been identified but not mined. A total of 38,375 acres within this WSA are subject to a USFWS withdrawal application which, if approved, would expand the adjacent Kofa National Wildlife Refuge.

Within the WSA at the old Salome Copper Queen, Moore claim groups, assay results from six samples show a trace of gold, from 0.26 ounces per ton (opt) silver to 1.80 opt silver and from 0.26% copper to 1.97% copper. Mineralized structures from which these samples were taken, trend S50°W, dip 52°SE, S80° and 58°W, dip 58°SE and N62°W, dip 64°NE. The structural trends bear right across the WSA to the southwest and southeast.

Figure 3 shows the occurrence of manganese deposits and copper with gold and lead vein-type deposits in the northeastern and western portions of the WSA. The GEM Report (Geology, Energy and Mineral Resources Assessment of the Kofa Area, Arizona) as well as the EIS indicates high mineral potential on the east-northeast one-third of the unit and on the Western one-third of the WSA. Figures 4 and 6 show the extent of the zones of mineral potential in the New Water Mountains WSA. Additionally, Figures 7 and 8 show the areas of favorable uranium and geothermal potential, respectively. These two zones currently occur outside the WSA boundary as depicted in the EIS.

From the information presented herein, it is the Arizona Mining Association's position that the New Water Mountains WSA has substantial mineral potential for gold, silver, lead, copper, zinc, manganese and molybdenum. The existence of deposits of sheelite, the potential for perlite, and outcrops of marble also have been identified in the WSA. The Association therefore, recommends that this area be deleted from further consideration for wilderness.

Little Horn Mountains West 2-126A and the Little Horn Mountains 2-127 (Refer to Figures 3, 9, 10, 11 and 12)

The area represents a large province, characterized by thin Tertiary volcanics and basement metamorphic rocks cut by extensional faults, which is known to host high grade gold mineralization in the Kofa and Little Horn Mountains. The North Star and King of Arizona Mines in the Kofa Game Range are exemplary of the prospective style of gold mineralization where structures cutting volcanics and basement produced an estimated 50,000 tons of ore grading 2 opt Au from North Star. The Rea Petro property in the Little Horn Mountains occurs in a similar geologic environment and is estimated to contain 120,000 tons of ore in zones 10 feet thick grading approximately 0.15 opt Au and 3 opt Ag.

Figure 3 shows the potential for gold mineralization in the southern portion of the Little Horn Mountains West. Figures 10 and 11 support this position as well as the substantial interest shown by mining claim locations in the unit. Additionally, there is a potential, as shown on Figure 11 for mineralization in the eastern portion of the Little Horn Mountain West unit as well as the southern third of the larger unit. Again this is substantiated by mining claim activity in the larger unit. There also is a possibility for uranium mineralization in the northern most portion of the Little Horn Mountains unit (Figure 12). Also the potential for gold and manganese mineralization extending into the eastern portion of the larger unit is shown in Figures 10 and 11.

The Little Horn Mountains West contain several mineral prospect adits and three vehicle ways (roads) as well as a fence line more than a mile in length. The unit exhibits low quality wilderness values and lacks outstanding primitive recreation opportunities. It also has no special features or resource values unique to the surrounding area. The lack of these wilderness attributes, as well as the nonfederal inholdings and manageability problems due to the areas mineral resources and the substantial number of mining claims within a large portion of the lower two-thirds of the unit, make the Little Horn Mountains West WSA undesirable for further wilderness considerations. With numerous gold and manganese mines,

prospects and deposits identified on the southwestern boundary of the unit and the potential for this mineralization to extend into the WSA, the Arizona Mining Association recommends deletion of this unit from further wilderness consideration.

The Little Horn Mountains WSA likewise contains 38 miles of roads, more than five miles of fenceline, and numerous known mining sites. Additionally, a number of mining claims and a high mineral potential area occurs on the Western flank of the WSA and extends into the center of the unit. The east boundary of the WSA contains a number of past producing gold and manganese deposits. There is a potential that this mineralization extends into the WSA and this possibility is recognized in the GEM report (Figure 11). As a result, the Arizona Mining Association agrees with the conclusion in the EIS that wilderness values in this unit are not considered exceptional. The WSA lacks other enhancing wilderness characteristics and would not contribute to the diversity of the National Wilderness Preservation System. The overall quality of the Little Horn Mountains WSA wilderness values and opportunities does not justify the units recommendation for wilderness designation.

Eagletail Mountains 2-128 (Refer to Figures 3, 13, 14, 15 and 16)

This WSA is approximately 65 miles west of Phoenix and contains 117,065 acres, 70,230 acres of which have been recommended as suitable for wilderness designation. The WSA is rated as having high mineral potential and medium mineral development potential. p. 129. Many areas within the WSA likely to contain minerals are not recommended as suitable for wilderness designation but a significant area of the Eagletail Mountains likely to contain minerals is recommended for wilderness designation. Within the WSA, known metallic deposits of gold, silver, copper and molybdenum have been identified. Additionally, manganese, barium and lead carrying veins also have been identified. The RMP also lists actinolite and tremolite non-metallics as being identified with the WSA.

There are 560 acres of privately owned mineral estate in this WSA that would have to be acquired before this area could be designated as wilderness. Because of the split estate problem, this area is an unlikely candidate for wilderness area and should not have been recommended for wilderness designation. For example, the Yuma District RMP, at p. 61, did not recommend for wilderness designation its Gibraltar Mountains WSA solely because of split estate problems.

On the northeastern side of the Eagletail Mountains WSA, in sections 21 and 22, T2N, R11W a sample was cut which assayed trace of gold, trace of silver and 0.70% copper. In the same

area a shaft was sunk on structures bearing N58°W, dipping 84°NE and N71°W dipping 66°NE. These structures trend across the WSA. The sample was taken from a quartz vein more than two feet wide which showed chrysocolla, malachite, chalcopryite and pyrite. There are numerous other narrow veins with primary sulfides in the WSA.

On the southeast fringe of the WSA within less than one mile of the WSA there are old prospects, shafts, and adits which explored northwest and southwest mineralized structures. Assay certificates noting values of minerals in the vein material show significant values in copper, silver and gold.

Figures 3, 14 and 15 indicate the existence of a zone of mineralization in the southwest portion of the WSA. The dominant deposits in this area are of copper and manganese and also include gold and silver deposits like the Davis Mine in section 19. Figures 14 and 15 also show copper mines and a zone of potential mineralization in the Double Eagle Mountains in the southeastern portion of the WSA. Additionally, Figures 14 and 15 show a mineral zone in the north-northeastern portion of the unit which exhibits past production of copper, lead and zinc. Numerous copper prospects exist within this zone and reconnaissance has been conducted on a number of them by member companies of the Arizona Mining Association.

With the significant potential for mineral potential in the southwest, southeast, and north-northeast portions of the WSA and the occurrence of the outlandish cherrystem which leads to a parcel containing 2,720 acres of nonfederal lands located near the middle of the WSA (which could cause management nightmares), the Arizona Mining Association recommends deletion of the Eagletail Mountains WSA from further consideration for wilderness designation.

East Clanton Hills 2-129 (Refer to Figures 3, 13, 14, 16, 17, 18 and 19)

The East Clanton Hills WSA exhibits high mineral potential. Mineral deposits identified within the unit include gold, silver, copper, lead, molybdenum, manganese, uranium as well as fluorspar and substantial potential for geothermal resources. Figures 3, 14, 16 and 17 show the high mineral potential and mineral deposits in the central and northern portions of the unit dominated by gold mineralization but also containing copper, lead, molybdenum and fluorspar.

Figure 18 shows the zone of uranium potential in the East Clanton Hills WSA. Figure 19 shows the geothermal resource potential for the southern half of this unit. Both types of mineralization are significant within the WSA.

As a result of the significant mineral potential of this WSA, the Arizona Mining Association recommends that the unit be deleted from further consideration for wilderness designation and be returned to multiple use management.

Face Mountain 2-136 (Refer to Figures 20, 21 and 22)

Figure 20 indicates the zone of potential mineralization for copper, silver, gold and lead in the northern portion of the Face Mountain WSA. Just to the south of this zone as well as overlying a portion of it, is a horizon of favorable uranium potential (Figure 22). In addition, the northeastern portion of the WSA fringes on an excellent geothermal resource area (Figure 20). There also are 32 mining claims in the WSA.

The Arizona Mining Association is in agreement with the conclusion reached on page 108 of the Lower Gila South Draft EIS that states, "Solitude is frequently disrupted, however, by the passing sounds of train traffic along the WSA's southern border. In addition, the WSA lacks outstanding primitive recreation opportunities, and there are no recognized special features or unique resource benefits, the opportunity for solitude alone does not justify recommending the Face Mountain WSA for wilderness. The WSA would be returned to multiple use management."

As a result of the above, the Arizona Mining Association recommends that the Face Mountain area not receive further consideration for wilderness designation.

Signal Mountain 2-138 (Refer to Figures 3, 23, 24 and 25)

This WSA is rated as having high mineral potential. The Arizona Mining Association agrees with that high mineral rating which can further be supported by almost 250 mining claims located within the unit. In the northern most part of the Signal Mountain WSA a number of copper mines and deposits have been mined in the past. These deposits contain significant gold and silver mineralization. Figures 24 and 25 show the zone of high mineralization.

Samples from claims in Sections 13, 14 and 15 T2S, R7W where the old Butte Mine workings exist showed assay values from 0.03% copper to 0.21% copper, while assay certificates of the owner in 1961 showed values as high as 2.6 ounces per ton gold, 2.00 opt silver and 24.45% copper from selected high-grade material on one of the old dumps near a mine shaft.

A sample from a dump of another shaft taken one year ago assayed 1.04% copper, 0.41 ounces per ton gold and 0.05 opt silver. This sample was taken from a shaft dump in section 14, T2S, R7W. There also are vein and fault structures in section 14 which trend S27-29°W, and dip 75-78°NW. The projection

of this trend traverses the Signal Mountain WSA. Additionally, there are adequate mineralization exposures within the northern part of the Signal Mountain WSA to disqualify large portions of these WSAs as potential wilderness.

The Draft EIS states that the Signal Mountain WSA does not contain exceptional or unique wilderness characteristics. Additionally, "solitude is frequently disrupted by noise of numerous trains along the WSA's northwestern border." As a result of the foregoing discussion, the Arizona Mining Association recommends that the Signal Mountain WSA be deleted from further wilderness consideration.

Woolsey Peak 2-142/144 (Refer to Figures 23, 24, 25 and 26)

This WSA is comprised of 73,930 acres of public land, 61,000 acres of which are designated in the RMP as suitable for wilderness. The WSA is listed as having medium mineral potential and medium mineral development potential. Almost all of the areas likely to contain locatable minerals and geothermal resources within this WSA are included within the lands designated as suitable for wilderness. According to the RMP this WSA has extensive copper deposits and has produced significant tonnage of medium grade copper ore. Lead, gold and silver also have been mined with good results. In addition, this WSA has produced barite, perlite and some welded tuff building stone and there exists the possibility of low grade uranium at depth. There is a high potential for geothermal resources along the eastern boundary of the WSA and the majority of these lands are included in the area designated as suitable for wilderness.

The eastern portion of the WSA has substantial potential for copper, gold and silver deposit (Figures 24 and 25). This zone extends into the WSA even under the proposed action alternative. The Arizona Mining Association recommends that the WSA eastern boundary as shown in the proposed action be moved an additional two miles to the west to generally coincide with the boundary between Range 5 West and Range 6 West (T1S). Not to do so would have a negative impact on mineral development in this area and would severely restrict all forms of mineral development on the existing mining claims and future mineral prospects. The same holds true for the significant uranium potential as delineated in Figures 24, 25 and 26 in the southeastern portion of the WSA. The WSA boundary in this area also should be pulled back to the township line.

Another area of favorable mineral potential occurs around Woolsey Peak in the north central portion of the unit. A number of past producing copper mines are located just north of the unit and the potential to locate other deposits within the WSA is high. The Association recommends that sections 2, 3, 4, 8, 9, 10 16 and 17 T3S R6W be deleted from further wilderness

consideration (as shown on Figure 24). This deletion would include Woolsey Peak.

Lastly, substantial potential for both locatable minerals and geothermal resources occur in a zone shown on Figure 24 in the southeastern portion of the Woolsey Peak WSA. The current boundary is located along a 69KV power line and the Association recommends that the boundary be adjusted to delete this high mineral potential and geothermal resource area (Sections 1, 11, 12, 13, 15, 16, 17, 23 and 24, T4S R6W).

North Maricopa Mountains 2-157 & Butterfield Stage Memorial 2-164 (Refer to Figures 27, 18, 29 and 30)

The Geology, Energy and Mineral Resources Assessment of the Maricopa Area, Arizona (GEM Report) indicates mineral potential for both WSA units (Figures 29 and 30) for copper and uranium. These WSA units are situated along the trend of mineralizing activity which extends throughout central Arizona from the Morenci and Safford areas westward through Globe-Miami, Christmas, Ray, Copper Creek, San Manuel and Superior areas. Both the North Maricopa Mountains and the Butterfield Stage Memorial WSAs border on the Francisco Grande and Casa Grande mining districts. As such, these lands present prime targets for exploration activities with potential for the development of new mines. Mineral possibilities are not limited to copper only, but also exist for silver, gold, lead, zinc and uranium.

The areas also contain favorable potential for nonmetallic mineral occurrence (Mica) and for building stone (granite) throughout the units. Additionally, over 500 mining claims occur within the units attesting to the potential of the areas.

As a result of the copper potential of the region due to its proximity to known porphyry copper deposits in the Francisco Grande and Casa Grande mining districts, the Arizona Mining Association recommends that the North Maricopa Mountains and Butterfield Stage Memorial WSAs be deleted from further wilderness consideration.

South Maricopa Mountains 2-163 (Refer to Figures 27, 29, 30, 31 and 32)

The GEM report for the South Maricopa Mountains WSA indicates mineral potential for copper resources and for uranium (Figures 29 and 30). Figure 31 also shows this favorable copper mineral potential in the central and eastern portions of the unit and in the western portion of the WSA for uranium potential. Over 400 mining claims have been located within the unit which attests to the WSA's mineral potential.

The South Maricopa Mountains WSA is situated along the trend of mineralizing activity which extends throughout central Arizona from the Morenci and Safford areas westward through Globe-Miami, Christmas, Ray, Copper Creek, San Manuel and Superior areas, to the Florence - Sacaton - Vekol Hills and Casa Grande areas. The unit borders on the Francisco Grande and Casa Grande mining districts. As such, these lands present prime targets for exploration activities with potential for the development of new exploration activities with potential for the development of new mines. Mineral possibilities are not limited to copper only, but also exist for silver, gold, lead, zinc and uranium.

A significant potential for geothermal resources exist on the western one-sixth of the WSA (Figure 32) and favorable potential for nonmetallic mica deposits exist in the unit. Additionally, a potential exists for granite building stone throughout the WSA.

As stated in the Draft EIS, the South Maricopa Mountains WSA lacks superior wilderness characteristics. The area is not particularly scenic and has no interesting or unique geologic or plant features. Much of the WSA is relatively flat bajada offering little to the primitive recreationist. These comments plus the potential for significantly favorable geologic horizons for minerals lead the Arizona Mining Association to recommend that the South Maricopa Mountains WSA be removed from further wilderness consideration.

Tabletop Mountains 2-172 (Refer to Figures 33, 34, 35, 36 and 37)

This WSA is comprised of 37,968 acres of public land, 34,400 acres of which have been designated as suitable for wilderness. Almost all of the areas within the WSA likely to contain locatable minerals and a major portion of the areas likely to contain geothermal resources are included within the area designated as suitable for wilderness. The RMP designates this WSA as having high mineral potential and medium mineral development potential. The Association feels that it is almost incredible that this area is recommended for wilderness because the RMP states that:

The mineralization [in Tabletop Mountains WSA] is more diverse and more concentrated than in any of the other WSAs studied in this supplement. Copper, gold, lead, silver, zinc, manganese and iron have been mined. An unusually low silica, high alumina basalt has been located in the area. Tantalum associated with iron has been located by exploration geologists. The presence of hydrothermal mineralization has been found in several localities of the WSA. Concentrations of mineralization have been identified along

the strike of nine known mapped faults within the WSA. A series of six intersecting faults are particularly high in mineral concentration. Mid-tertiary intrusives are numerous. Most of the area was subject to recent basaltic volcanism that enhanced mineralization. . . . Fluorspar, perlite, and building stone have been located in the area.Known geothermal areas abound around the WSA. (p. 155).

Affirming this statement is the fact that there are at least 14 different claim groups containing over 150 mining claims located within the WSA.

In the area of sections 32, 33 and 34, T7S, R2E and sections 4 and 5, T8S, R2E, claims were examined and sampled in the 1950s and again in the 1970s by a number of mining companies' exploration teams. Some assay results of samples taken show values from 0.10 to 0.60% copper. One high grade sample assayed 0.25 opt gold, and 1.55% copper. Minerals of azurite, malachite, chrysocolla, cuprite and tenorite exist on those claims.

The Table Mountains Area borders on the Francisco Grande and Casa Grande mining districts. As such, this area presents a prime target for copper exploration activities with the potential for the development of new mines. Mineral possibilities are not limited to copper only, but also exist for silver, gold, lead, zinc and uranium.

As shown on Figures 33 and 35 the WSA exhibits high mineral potential, especially for copper resources. This potential encompasses most (over 65 percent) of the WSA. Additionally, there is a potential for uranium mineralization in the northeast portion of the unit near and around Indian Butte (Figure 36) and in the western portion of the WSA, west of Black Mountain (Figure 36). Geothermal resource potential also is present in the northwestern portion of the unit (Figure 37).

From the foregoing, it is readily apparent that due to the large number of mining claims and significant mineral potential within the WSA, the Tabletop Mountains unit should be deleted from further wilderness consideration.

We appreciate the opportunity to submit our written comments on the Lower Gila South Draft Resource Management Plan and Wilderness Environmental Impact Statement.

270

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EMS TRANSMISSION

May 2, 1985

To: District Manager, Phoenix District Office, Bureau of Land Management, Phoenix, AZ

From: Field Supervisor, Fish and Wildlife Service, Ecological Services, Phoenix, AZ

Subject: Review of Draft Lower Gila South Resource Management Plan/ Environmental Impact Statement and Wilderness Supplement

We have reviewed the subject document and have the following comments.

Our review is guided by the Federal Land Policy and Management Act of 1976 which requires BLM to manage the resources on public land for multiple use and sustained yield. This legislation also dictates that public land be managed in a manner that will protect the quality of the scientific, scenic, historical, ecological, environmental, air and atmospheric, water resources, and archeological values, and that will provide food and habitat for fish and wildlife.

The alternatives that we believe provide no consideration for these values are the No Action Alternative, the Proposed Action, and the Resource Production Alternative. These alternatives do little to protect the above mentioned values from urbanization, agricultural development, increased recreation pressure, inadequate livestock management practices, floodplain development, and mineral and energy development. These activities currently exist in the area and their development and intensity will probably increase given growth and development projections for the greater Phoenix area, which includes part of the Lower Gila South for the next 25 years. The Resource Protection and Environmental Protection Alternatives provide some consideration for these values.

For the five alternatives presented, there are two major omissions from the document:

1) specific information on resources present and their status (this would include tables, appendices, and references), and 2) a description of the monitoring program. For example, little wildlife information is provided concerning species locations and population status within the Lower Gila South management area. We consider this a major flaw in the development of a resource management plan which will be used as the basis for managing this area for the next 25 years or longer. Information that is lacking should be obtained as soon as possible and incorporated into the draft RMP-EIS. If these data are not adequate to determine wildlife resource status or any other resource's status, then we believe BLM should comply with the Council on Environmental Quality's regulations which require that a worst case environmental analysis must be assumed and presented in the environmental consequence chapter.

Currently, this chapter is rather vague about the benefits or adverse impacts to resources, specifically wildlife resources, from implementation of each of the five alternatives.

Response - Letter 270

270-1

The Resource Management Plan (RMP) is designed to guide and control future management actions and the development of subsequently more detailed and limited scope activity plans for resources and uses. The activity plans that will be developed for Lower Gila South Planning Area will be site-specific and will involve input from other Federal, State and Local agencies and the interested public. These plans may be prepared for livestock allotments (AMP's) Wildlife areas (HMP's), designated wilderness areas (WMP's) and for other resources, such as, cultural resources and threatened and endangered species.

Many comments received on the Lower Gila South RMP/EIS requested more detailed and site-specific data. This plan was not designed to address site-specific actions nor the impacts of those actions. The site-specific actions and impacts will be analyzed in the activity plans and associated environmental assessments. The RMP will guide the development of the activity plans and the implementation of those and other actions in the planning area.

COMMENTS AND RESPONSES

270-1

270-1

No monitoring program is described in the document. The purpose of a monitoring program is to detail how BLM will determine whether effective resolution of the planning issues and achievement of the desired results has occurred. A monitoring plan is generally considered part of the mitigation which is usually included in the description of each of the alternatives. The intervals and standards of the monitoring plan should have been included in this document for public review and comment. They should not have been referenced, as was the case with rangeland monitoring, as being available in the Phoenix District Office. This information is not easily accessible to the general public. If the monitoring plan is not included in the draft RMP-EIS this precludes the public from commenting on the adequacy of the monitoring plan. We suggest that an addendum to the draft RMP-EIS which contains the monitoring plan be released for public review prior to release of the final RMP-EIS.

We are interested in the criteria used to determine which wilderness or portions of WSAs were designated and which were not. There is a brief general discussion, but the specific reasons should be addressed for each WSA. We are especially interested in the Little Horn Mountains West WSA. This area has crucial bighorn sheep habitat and would abut the Kofa National Wildlife Refuge's proposed wilderness. In the Resource Protection Alternative, this area is not included whereas the Little Horn Mountains WSA is. The inclusion of both of these WSAs into the Proposed Action would create a large contiguous wilderness area that would provide excellent wilderness quality and benefit bighorn sheep. If the inclusion of these WSAs is not possible, we recommend that these areas be designated as primitive areas and be subject to mineral withdrawals and similar constraints on surface disturbances (road construction, ORV activity, communication sites and utility development).

Concerning endangered species, we wish to point out that under present regulations and the law itself, all Federal actions that may affect a listed species are subject to formal Section 7 consultation. Since there would be effects from the proposed action and alternatives, some adverse and some beneficial, it is the responsibility of BLM to initiate formal Section 7 consultation on all actions which affect a listed species. Therefore, all actions that would be contemplated under this management plan must be evaluated for impacts including management of the Cameron allotment.

Specific Comments

Page 1, Introduction - What is the life of this resource management plan? How frequently does BLM intend to review and update the information provided in the plan? We suggest that a revision of the plan occur once every five years. Prior to management adjustments being made, the public should have the opportunity to review and comment on these changes.

270-2

BLM will initiate formal Section 7 consultation with USFWS concerning any change in management which may affect endangered species such as Sonoran pronghorn. The alternatives proposes no immediate change from the current level of livestock management. Monitoring of Sonoran pronghorn habitat on Cameron Allotment has been instituted by BLM. This will monitor long-term range trend compared to trend on the adjoining Cabeza Prieta National Wildlife Refuge. Refer to Chapter 2, Management Guidance Common to All Alternatives, Wildlife Programs, No. 3 in this document.

270-3

The RMP will guide management of the area for the next 10 or more years, as stated in the draft document, page 1, column 1, 5th paragraph.

Pages 2-6, Issues Analyzed - Only five issues are presented in this section, and of these, only four are discussed in the draft RMP-EIS. In a statement published by the League of Women Voters in March 1981 which outlined the issues identified by the public during scoping meetings, the following issues were identified: at the Ajo and Gila Bend meetings the public identified availability of water to wildlife; at the Buckeye meeting they identified floodplain management; at the Phoenix meeting they identified wildlife and vegetation, wildlife preserves, and bighorn sheep habitat; and at the Quartzsite meeting they identified cactus protection. The Fish and Wildlife Service was also concerned about bighorn sheep habitat and associated resource conflicts of off-road vehicle use, mineral and energy activities, grazing, and road management. Of these, only grazing is identified by BLM as a major issue. We believe that wildlife, recreation, mining activities, special management areas, special status species protection, and floodplain management which were identified by the public and the Fish and Wildlife Service should be included and evaluated as major issues in this draft RMP-EIS. Resource management plans are mandated by FLPMA to allocate resources and select appropriate uses for public lands. RMPs are undertaken where conflicts are seen as requiring a plan to solve the problems. The problem of degradation of wildlife resources through poor grazing practices, mineral and energy activities, off-road vehicle use, and other activities which impact wildlife habitat have been reiterated to BLM by numerous resource agencies, private organizations, and individuals. Because wildlife and the aforementioned issues are already, or in the near future, will be in conflict with other land use practices under the multiple use land management concept, these issues should be addressed in this draft RMP-EIS and the problems reduced or solved. Under Issue 2: Wilderness, apparently no split estate WSAs were considered in this draft RMP-EIS. We believe this is an oversight by BLM, and that these areas should have been included in this document for public review. Specifically, we would like to recommend that the Sierra Estrella WSA be added to this document and that it be recommended for wilderness designation.

270-4

Page 4, Issue 4: Utility Corridors - No new communication sites are proposed for designation. Instead, BLM would study potential sites on a case by case basis and require a communication site plan. Because this document is a long-term resource management plan, we believe BLM should designate potential communication sites for future development just as they have designated utility corridors for future use. These sites should be reviewed by the public, and based on this input, communication sites should be designated and enforced.

Page 4, Issue 5: Fred J. Weiler Greenbelt - This issue is not discussed nor is a recommendation made by BLM concerning this issue. Instead BLM states that an environmental assessment will be made available to the public. No estimated date is given as to when this issue would be analyzed and the document available to the public. Because this is an issue that was identified by the public, we do not understand why BLM has decided to postpone addressing this issue in the draft RMP-EIS. By not addressing this issue or the other issues identified by the public and agencies, BLM appears to be taking a selective and piecemeal approach to long-term management planning and analyses of associated impacts. We believe this is an unwise approach and also contradicts CEQ's regulations which require that cumulative impacts must be addressed. In addition, we believe that the future management of the Weiler Greenbelt could have a significant impact on the human environment, therefore, and environmental assessment probably would not be adequate. In addition, compliance with Executive Orders 11988 and 11990 should be included in the draft RMP-EIS; an appropriate place to discuss them would be under Issue 5.

270-5

Page 5, Map 1-2 - This map is very difficult to read. The legend says that the dashed lines designate county lines, however, we counted at least nine such lines. Please note that future utility construction is not considered compatible with the tenets of establishing and operating a wildlife refuge. Consequently, such construction will not be permitted within the Kofa National Wildlife Refuge. We suggest that Utility Corridors 1 and 2 be relocated on the map to run adjacent to Interstate 10.

270-6

Page 9, Proposed Action - Please explain how this alternative will provide for a balanced level of production while protecting important resource values. The impacts to mule deer, bighorn sheep, Sonoran pronghorn, and desert tortoise under the Proposed Action (pages 59 - 60) do not support the statement on page 9.

270-4

At the time this draft document was prepared, the Interior Board of Land Appeals (IBLA) had issued a decision that split-estate lands could not be included in the wilderness review process. On April 18, 1985, District Court Judge Karlton ruled that split-estate lands are to be considered in the wilderness review process. The Bureau of Land Management in Arizona will prepare a Wilderness EIS on those WSAs that were dropped from review by IBLA in 1986 and 1987; Sierra Estrella will be included in that EIS.

270-5

See response 257-4.

270-6

BLM will monitor allotments where livestock conflict with the needs of desert tortoise, desert bighorn, Sonoran pronghorn, and other threatened or endangered wildlife species. Use adjustments may be necessary to reduce or eliminate these conflicts.

- 270-7 Page 9, Rangeland Management Issue - The Proposed Action's grazing management objectives are to maintain ecological rangeland condition currently in good to excellent condition and to improve those areas in poor to fair condition. Unfortunately, we fail to see how the proposed action would accomplish this objective. Authorized grazing use would not change from current grazing use in the short-term and would increase over No Action in the long-term (Appendix 11, page 268). According to information provided on page 272, nine of 22 Perennial-Ephemeral allotments have 50% or more of their area that cannot be placed into the good or excellent condition category and only three of these show any indication of upward trend. The methodology BLM employs to determine range condition is also questionable. Those allotments categorized in good or excellent condition may have lost one or more important perennial species and still be listed in good or excellent condition. In addition, supplemental permits for ephemeral grazing could be issued which would provide added competition between wildlife and cattle for forage. BLM's apparent solution to the problem is to build additional rangeland improvements and move the cattle to previously little-use areas in good to excellent condition to utilize this forage. Unfortunately, these are the areas where wildlife species such as desert mule deer have used to locate adequate forage (page 59). The data presented by BLM in this document clearly show that much of the rangeland within the Lower Gila South is overgrazed. This overgrazing impacts not only wildlife, but also vegetation, water shed, and the soil.
- 270-8 We fail to see how BLM can continue to endorse this course of action given their stated responsibility under FLPMA. Consequently, we cannot support any alternative that proposes to maintain or increase current grazing levels.
- 270-9 Page 11, Rangeland Monitoring - This section is unclear and confusing. Please rewrite this section for clarity of method and what the data would accomplish.
- 270-10 Please explain why none of the allotments in the Lower Gila South are designated in the Improve category. No mention is made as to how the supplemental permits to utilize ephemeral forage would be managed and monitored. How does BLM determine proper stocking rate on ephemeral forage, monitor ephemeral utilization, and determine when livestock will be removed? If such permits are issued, monitoring of ephemeral forage should be conducted on perennial-ephemeral allotments as well as ephemeral allotments. Ephemeral forage is high in protein content, generally more palatable than perennial shrubs, and a necessary component in the diets of many wildlife species such as bighorn sheep, mule deer, Sonoran pronghorn, and desert tortoise for successful reproduction and survival. We believe BLM should not permit seasonal ephemeral forage utilization by livestock. Many desert adapted wildlife species barely survive dry years when ephemeral forage is scarce; they depend on the ephemeral forage available during wet years to get them through the dry years. By permitting additional AUMs when ephemeral forage is present, BLM is converting the traditional wet year to a dry year. Resulting adverse impacts to wildlife may include reduced fertility and recruitment which means reduced population viability.
- 270-11 Page 12, First Paragraph - We support BLM's preparation and implementation of a burro capture plan in the Painted Rock Reservoir area.
- Pages 12-14, Land Tenure Issue - The legal descriptions of the lands proposed for disposal or acquisition may be provided in Appendix 3 but these are difficult and cumbersome to attempt to locate on the maps provided. We suggest that BLM indicate where the larger parcels are on a map and include this information in the final RMP-EIS.
- Page 14, Utility Corridor Issue - The concept of designating utility corridors for future planning is an excellent idea. However, for this planning to be effective, it is also necessary that BLM enforce the development of transmission and pipelines only within the designated corridors.
- Page 14 - From the information provided we assume that a major effort will be made to trade land recommended for disposal for lands recommended for acquisition in order to minimize the effects to areas outside the Lower Gila South area.
- 270-7 See page 55 of the draft RMP - Impacts to Vegetation
- 270-8 BLM coordinated extensively with the Soil Conservation Service, University of Arizona, and the Arizona State Land Department in developing the local procedures for the inventory. The data were then applied consistently throughout the planning area.
- 270-9 During favorable wet years when ephemeral forage is known to exist and the authorized officer determines that enough forage is available for wildlife, livestock grazing may be authorized.
- 270-10 These initial categorizations are subject to change as new information becomes available through monitoring. During BLM's initial categorization, BLM range specialists and management determined that the allotments in the Lower Gila South planning area did not have a high production potential for a positive economic return on investment. This does not preclude BLM from implementing AMPs on M or C allotments. The general rule of thumb in authorizing livestock use on ephemeral range is to take half and leave half. In general, the Bureau should not authorize ephemeral grazing when:
- 1) ephemeral growth is less than one inch in height,
 - 2) soil moisture in the top 18" is not sufficient to assure continued growth.
- 270-11 Stocking rates on ephemeral range are based on professional judgement of reasonable potential for ephemeral forage and are monitored through field examinations.

- 270-12 | Why are existing rangeland developments not to be maintained under the No Action Alternative?
- 270-13 | Page 16 - Please explain why this is the only alternative that allows for rangeland improvements to benefit wildlife. If this concept is implicit in the other alternatives, then please say so. If it is not, it should be.
- Page 17, Implementation - We do not understand why BLM would not develop AMPs under this alternative but may develop HMPs. Allotment management plans should be developed for each allotment and habitat management plans should be developed to cover all areas within the Lower Gila South. The commitment to develop and implement these AMPs and HMPs should be a part of all the alternatives presented. When any AMPs and HMPs are developed, we request that the Fish and Wildlife Service be given the opportunity to participate in this process.
- Page 19 - We suggest that the Management Guidance Common to All Alternatives section be placed before the discussion of the issues in the alternatives.
- Under Allotment categorization, it appears as though there has been no public input used in the determination of the grazing allotment categories. We believe we should be given the opportunity to participate in this process.
- Under the Rangeland Monitoring Program, please specify which allotments will be monitored. The Cameron Allotment should be included.
- 270-14 | Page 22, Wildlife Program - Endangered and threatened wildlife and plants together with the requirements under the Endangered Species Act should be addressed here.
- BLM states that the wildlife program was not identified as a major issue in the Lower Gila South RMP-EIS area. We disagree with this statement. The public did identify wildlife as a major issue during the scoping process. Please refer to our comments for pages 2-6.
- Please reword number 8 to read that blading will not be used for fence construction or access for fence construction.
- Page 23, Woodcutting Permits - Please note that state permits are required to collect dead or detached firewood from mesquite, palo verde, ironwood, and crucifixion thorn trees. A permit is also required for the destruction or removal of any state-protected plant.
- Page 29, Protected Plants - From the information provided, *Mammillaria thornberi*, a species proposed for listing, occurs within the boundary of the Lower Gila South. occur or may occur.
- Page 31, Individual WSA Descriptions - Please note that the Fish and Wildlife Service has a withdrawal application for all of WSA 02-125 and part of WSA 02-126A.
- Page 36, Land Uses - It would be helpful to provide the complete reference plus a paragraph or two on the alternative selected in the Record of Decision and Final Environmental Impact Statement for Arizona Hazardous Waste Facility, Maricopa and Yuma Counties, Arizona.
- 270-15 | Page 37, Riparian Habitat - Please qualify the statement that salt cedar provides excellent nesting grounds for white-winged and mourning doves to reflect that habitat for dove reproduction is provided only by trees at least 12 to 15 feet high.

- 270-12 | Permittees and lessees in all alternatives except the environmental protection alternative will maintain structural improvements constructed to benefit livestock grazing, which in turn will benefit wildlife. The maintenance of improvements not designed for the primary benefit of livestock grazing may be assumed by the BLM, or nonlivestock cooperators. Also, refer to the draft RMP, page 19, Rangeland Developments, and page 22, Wildlife Programs which discusses management guidance common to all alternatives on livestock waters.
- 270-13 | See page 22, column 2, Wildlife Program
- 270-14 | See response 270-2.
- 270-15 | Statement will be changed to read salt cedar provides nesting habitat for white-winged and mourning dove, with the highest nesting production occurring in trees stands at least 12 feet high.

270-16 Two allotments overlap the Palomas Plain in the western edge of the planning area. They include the Eagle Tail (P-E) and Palomas (E) allotments. Very light to no grazing use has been made on the Palomas Plain and no changes are foreseen in the future. The Palomas allotment would continue to be managed in accordance with the Special Ephemeral Rule (see Appendix 24 in PFEIS).

270-17 Mining activities in Lower Gila South are mainly either lode (hard rock) or placer (sand) activities. These activities vary with the individual miner, host material, available equipment, environment, and terrain. There are some 230 different kinds of mining activity. Basically, mining activity follows a sequence of operations: (1) securing a claim; (2) surveying the claim; (3) exploration, this may be in the form of geophysical, geochemical, assaying, mapping, and geochronological and stratigraphic analysis; (4) pilot plant operations consist of small-scale activity involving removal of ore, crushing, screening, and sorting of ore concentration or beneficiation of concentrate; (5) then either processing or shipping to smelter. If financial feasibility is indicated, then full scale mining and milling operations take place. Delineation of the ore body and estimation of the life span of the mine is made during exploration activities and revised during subsequent operations.

Operators are not required to declare what mineral they are after. The following minerals are known to occur in the Lower Gila South area: gold, silver, copper, lead, zinc, barium, tantalum,

270-16 Page 37, Big Game - Is the Palomas Plain contained within a grazing allotment? Since it has not been grazed we recommend that this area be protected from future surface disturbance including grazing, mining activity, road construction, and off-road vehicle activity.

Page 40, Nongame Animals - Because the Gila River area, Table Top Mountains, Sierra Estrella, and South Vekol Valley provide unique or remnant habitats for a number of special status species, we believe these areas should be designated as special management areas or Areas of Critical Environmental Concern with protection of these unique qualities from surface disturbance such as mining activities, road construction and off-road vehicle use, and grazing. Wilderness designation would not provide protection from grazing impacts or some mining activities. Designation of additional special management areas should also be implemented by BLM for state-listed and state-protected species, rare plants, and cultural resources. Such areas should include those lands administered by BLM that have been designated or are recommended for designation under the Arizona State Parks Natural Areas program. Within the Lower Gila South these areas include Table Top Mesa, White Bur Sage, Agua Caliente Mountains, Sentinel Plain, Eagletail Mountains, and part of the Sierra Estrella. Please inform us as to why Arizona does have any ACECs designated on BLM land.

270-17 Pages 40-41, Minerals and Energy - What type of mining activity is ongoing and what minerals are mined?

Page 43, Soil Erosion and Productivity - This section does not address soil productivity.

Page 47, Medium Ranch - If a representative medium ranch in the Lower Gila South operates at a net annual loss, please explain why such money-losing operations would continue on the Lower Gila South.

Page 53, General Assumptions for Analysis - Since assumption 1 is probably unrealistic given recent and foreseeable budget cuts, we recommend that BLM prioritize all implementable components of the RMP so the public will know what will be implemented first, and if additional funding and manpower are available, what will be implemented later.

270-18

Page 53, Rangeland Management - Please explain how these assumptions deal with wildlife-livestock competition, potential disease problems, and changes in range condition and trend. What would constitute "other affected groups" in Assumption 1?

Page 53, Wilderness - The first assumption should be deleted and the analysis conducted according to CEQ regulations. In addition, we do not believe the impact conclusions as presented are based on reasonable probabilities. Within the next 25 years the population of the Phoenix metropolitan is projected to almost double and the demand for and importance of nearby wilderness areas will greatly increase. This increased demand should be reflected in the analysis.

Page 54, Wildlife - These three assumptions should be included under the Wildlife Program on pages 22 and 23.

270-19

Page 54, Impacts on Rangeland Management - Will the new rangeland developments be put in immediately on or after a monitoring period? It might be helpful to state which allotments on the WSAs are custodial and which are maintain.

Page 55, Impacts on Vegetation - There is no mention of impacts on riparian vegetation. Because this habitat is crucial to the survival of most wildlife species during part or all of their life, and it provides needed soil stabilization, we believe BLM should address the impacts of all alternatives in the draft RMP-EIS.

270-20

Page 59, Mule Deer - Under Mule Deer the conclusion is reached that long-term beneficial impacts may result if monitoring studies call for an adjustment in livestock use. If, after five years of monitoring range condition, trend, and utilization, a decision is made to reduce livestock numbers, how long would it take BLM to implement the recommended reduction?

270-21

Because deer utilize areas of low livestock use, the preferred alternative would distribute livestock to these previously low use areas. The result would be a continuation of the ongoing forage conflict between livestock and cattle except that now the conflict would be greater. It would be harder for deer to find areas of low livestock use; therefore, implementation of the proposed action would result in greater adverse impacts to mule deer than currently exist. This would also be true for Sonoran pronghorn and for those species with small home ranges such as the desert tortoise.

cobalt, molybdenum, manganese, iron, beryllium, arsenic, uranium, fluoride, tungsten, niobium, thorium, and titanium. Nonmetallic: Talc, gypsum, sodium chloride, marble, quartzite, zeolite, perlite, bentonite and other clays.

270-18

All resources would be evaluated before any adjustments in livestock numbers are made or construction of new range improvements are allowed through the environmental assessment process. Any adjustment would be coordinated with livestock operations and other affected parties such as the State Land Department and the Arizona Game and Fish Department.

270-19

The implementation plan will state the order in which range developments will be built. Table 2-6, page 19 of the draft EIS lists the allotments by category and in Chapter 3 of the Wilderness Supplement under each WSA, the affected allotments and the percentage of the allotments within the WSA are stated.

270-20

Monitoring and adjustments of rangeland use are described on Page 11 of the draft. Adjustments in livestock numbers will be placed in over a five year period or by a decision.

270-21

Deer also utilize areas of high cattle use because forage preferences are not the same for all species. The preferred alternative would reduce completion in the high use areas by distributing cattle more evenly and reducing the competition in high use areas. BLM studies indicate that improved livestock distribution through rangeland developments improved mule deer habitat and population numbers.

Pages 59-61 - Please quantify how many "new" acres of grazing land would be accessible to livestock from implementation of the proposed action and other alternatives and how many mule deer, bighorn sheep, Sonoran pronghorn, desert tortoise, and other special status species added would be impacted by implementation of the alternatives.

If disease transmission became a significant problem, would BLM require that cattle numbers be reduced or relocated?

270-22 Page 60, Desert Bighorn Sheep - If disease transmission became a significant problem, would BLM require that cattle numbers be reduced or cattle relocated?

270-23 Please indicate on a map where the proposed fencing would be located. Also, please estimate the number of bighorn sheep that would encounter these fences during their yearly movements.

270-24 Page 60, Sonoran Pronghorn - Please explain why authorized AUM's on the Cameron allotment are not reduced. If there are impacts to the Sonoran pronghorn's habitat and habitat quality is declining, this needs to be addressed under the Endangered Species Act.

270-25 Page 60, Desert Tortoise - Please include a discussion on how the ephemeral grazing permits would impact the desert tortoise and the number of tortoises that may be affected by forage conflicts with livestock. Although BLM states that the proposed action will have significant long-term adverse impacts on the desert tortoise, there is no indication that BLM proposes to attempt to reduce or eliminate these impacts through mitigation. BLM should address mitigation in this section and propose specific measures to implement.

270-26 Page 60, Riparian Habitat - Please add to this section that livestock readily consume young willow, cottonwood, and mesquite trees. Although livestock may not inhibit the establishment of these trees, they do adversely impact their chances for survival. Reduction in stocking rates would do little to improve survival of native riparian trees.

There is no mention of impacts to aquatic resources from implementation of any of the alternatives. This should be added to the draft RMP-EIS and should include seeps and springs as well as rivers and streams.

Page 61, Conclusion - We disagree that that Proposed Action would result in either slightly beneficial impacts to Sonoran pronghorn, mule deer, and riparian habitat. BLM is assuming that rangeland monitoring will result in reductions of permitted livestock use and this is uncertain. Rather, implementation of the proposed action is more likely to have an adverse or significant adverse impact on the Sonoran pronghorn, mule deer, desert bighorn sheep, desert tortoise, and riparian habitat as well as most of the wildlife species in the Lower Gila South. Please see our comments for pages 59 - 61. Because of these adverse effects, we believe BLM should propose and implement mitigation measures to reduce or eliminate the severity of these impacts. This mitigation should be included in the draft RMP-EIS for public review and comment.

Page 62, Disposal - Because the impact of land disposal cannot be fully assessed at this time, BLM should have included a worst case scenario of the impacts. Such an analysis should include the number of acres of each habitat type that may be disposed of and the special status species in each habitat type that would be affected by such an action.

Page 62, Acquisition - Would lands acquired for part of the Weiler greenbelt be withdrawn from mineral and energy development, livestock grazing, or other types of surface disturbance?

Page 62, Split Mineral Estate - Please indicate what stipulations BLM would or may place on mineral and energy activities. We recommend that BLM require that a bond be posted as an incentive for the developer to use mining or exploration techniques that will result in the least amount of damage to the environment. BLM should also insure that all mining operations comply with the new Army Corps of Engineers regulations for implementing Section 404 of the Clean Water Act.

Page 63, Utility Corridor Issue - This conclusion is valid only if BLM enforces construction of utilities within the designated corridors.

270-22 To date there is no disease reported/documented transmissions from cattle to big horn sheep. Disease transmission is more likely to occur when domestic sheep are allowed to graze in areas adjacent to bighorn sheep habitat. No domestic sheep grazing is currently permitted in the planning area. Livestock grazing would be reduced or eliminated in the event of significant disease transmission to bighorn sheep.

270-23 Exact location of some of the fences has not been determined. Fences in bighorn sheep habitat would not be allowed in the event of any significant impacts to bighorn sheep migrations that could not be mitigated.

270-24 Rangeland monitoring and wildlife habitat studies would be used in determining any needed adjustments to reduce conflicts between Sonoran Pronghorns and livestock.

270-25 We do not have any situations of over utilization on ephemeral areas. Ephemeral use by livestock has little or no impact on desert tortoise.

270-26 Many adverse factors act to suppress cottonwood and willow reproduction along the Gila River as stated in the section in question. Livestock grazing is only one factor which limits cottonwood and willow reproduction. Flow regimes which are regulated by upstream reservoirs are very drastic and favor salt cedar at the expense of cottonwood and willow.

Three small seeps are known to occur in LGS. These are important big-game water sources but are too limited to support significant riparian growth or aquatic fauna.

- 270-27 | Page 63, Impacts on Minerals and Energy - The third sentence contradicts page 57, paragraph 3.
- Page 65, Impacts on Recreation - There is no mention of impacts to off-road vehicle use.
- Page 68, First Paragraph - Please change the second sentence to read that ranchers would be required to build and maintain range improvements in a fashion that would not impair wilderness values.
- Pages 69-70, 73, 77-78, and 83, Impacts on Vegetation - Please refer to our comments on page 55.
- Pages 70-71, and 73-74, Impacts on Wildlife - Please refer to our comments on pages 59 through 61.
- Page 71, Impacts on Wildlife - Discussions of monitoring competition between wildlife and cattle should be addressed in other sections of this document.
- Pages 233-267, Appendices 3 through 10 - Please include a map of the proposed locations of land for disposal and for acquisition.
- 270-28 | Page 268, Appendix 11 - Can these stocking rates be increased or decreased depending on range condition, utilization, and trend? If they can be altered, what is the maximum percentage of alteration and over what minimum period of time can this allocation be implemented?
- 270-29 | Please indicate those allotments with rest rotation, deferred grazing or similar grazing management operations.
- Page 269, Appendix 12 - After reviewing the criteria for the maintain, improve, and custodial grazing allotment categories, we believe that some of the allotments within the Lower Gila South do qualify for the Improve category. We would be happy to work with you on revising the categorization of allotments within Lower Gila South.
- 270-30 | Page 271, Appendix 14 - Please inform us as to what the asterisk indicates.
- 270-31 | Page 272, Appendix 15 - The percentages under the Condition column do not add to 100%.

Thank you for the opportunity to review this document. We request that you coordinate with this office in any future actions that may include public involvement and we look forward to working with you over the long term to assist you in complying with the Federal Land Policy and Management Act and Endangered Species Act.

cc: Regional Director, FWS, Albuquerque, New Mexico (AHR)
State Director, Bureau of Land Management, Phoenix, Arizona
FWS/EC, Washington, D.C.

- 270-27 | Page 63, third sentence. Will change the sentence to read, No new prospecting.....
- 270-28 | Adjustments in stocking rates would be made if needed based on utilization, trend in rangeland condition, and precipitation. After consultation, coordination, and cooperation adjustments to grazing preference shall be implemented through a documented agreement or by decision. If data to authorized officer are available, an initial adjustment shall be taken on the effective date of the agreement or decision and the balance taken in the third and fifth years following the effective date. Also see response 257-31.
- 270-29 | Presently no P-E allotments are managed under specific grazing systems. Many allotments (ephemeral) are grazed on a seasonal basis when conditions for a favorable ephemeral forage crop exists.
- 270-30 | Asterisk indicates source: SCS Range Handbook.
- 270-31 | Corrections have been made in the final RMP.

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SIERRA CLUB

Grand Canyon Chapter - Arizona

5/01/85

Bill Carter
Phoenix District Office, B.L.M.
2015 West Deer Valley Road
Phoenix, Az. 85027

Re: Lower Gila South RMP/EIS analysis and comment.

Dear Mr. Carter,

Following are the official Grand Canyon Chapter Sierra Club comments on the RMP/EIS. These comments are supplemental to those presented by Joni Bosh on behalf of the Chapter at the public hearings in Phoenix. Please enter these comments into the official record.

Four separate authors participated in this analysis: myself, Paul Hirt- Rangeland Management; David Goldstein- Wildlife and Wilderness; Candy King -Soils and Cultural Resources; and Jim Notestine -Recreation. The comments from these authors follow in that order.

We sincerely appreciate the opportunity to participate in public lands management and planning. We look forward to your considered responses to our concerns and hope to be able to work with you in the future toward sound management of our public land resources.

Sincerely,

Paul W. Hirt

Paul W. Hirt, Conservation Chair
Grand Canyon Chapter, Sierra Club
1038 N. Perry
Tucson, Az. 85705

1

RANGELAND MANAGEMENT

The entire range management program of the Proposed Action is unacceptable. Decisions are based on incomplete or non-existent data, they ignore the basic requirements of resource conservation, promote the continuation of significant adverse environmental impacts, make no effort to even acknowledge the need for widespread improvement of allotment management, and are wholly biased toward sustaining the marginally productive and largely destructive domestic livestock industry on lands much better suited for other multiple uses.

Following are specific comments on the most obvious problems in the RMP/EIS relating to rangeland management.

Pg. 2- Right from the start you admit that rangeland management actions need to be reviewed to, "aid in stabilizing the livestock industry through management actions." This is not a legislative mandate. You are only required to consider the effects of your actions on local economies, not manage to sustain local special user interests.

It is obvious throughout the RMP/EIS that the driving element of the proposed action is to sustain dependent livestock operations. From just about any rational perspective, there is little to justify this management direction. There are only a total of 17 permittees running an average of 40,000 Animal Unit Months per year, providing less than 1% of the livestock products generated in just the local 3 county area alone (pgs. 46 & 48). $\frac{1}{4}$ of these permittees aren't even running a profitable business (p. 47).

Livestock operations in this RMP/EIS area have had a significant adverse impact on the environment (see comments re: pg. 29 following), their contribution to local and state beef supplies is virtually insignificant, their economic contribution to regional economies is almost as insignificant, and the benefits to costs of the range programs supporting them are very low.

Sustaining the few permittees dependent on this hand-out of public forage will have absolutely no effect on "stabilizing the livestock industry". All the proposed action does is continue a welfare like subsidy program for a few businessmen engaged in outdated and

marginal or submarginal operations. The public deserves more from its lands than that.

271-1

Pg. 9- You state that the B.L.M. "would not initially adjust livestock numbers..." Is this because you don't think reductions are necessary? Or is it because you don't think you have the data yet to "prove" your decision to reduce numbers in an administrative appeal process? (I believe the supporting documentation to justify reductions is presently sufficient.)

271-2

Pg. 11- Rangeland Monitoring. You refer to a "Lower Gila Monitoring Plan" that would provide guidance for monitoring allotments. I would like to receive a copy of this plan for review and comment. Please send it to me as soon as possible or otherwise contact me regarding this request.

From indications in the RMP/EIS (pgs. 11 & 19) this monitoring plan appears inadequate. It overly focusses on livestock utilization of forage, rather than general habitat and ecosystem integrity, soil stability or overall watershed quality. Eg: "...monitoring studies would include actual yearly livestock use, forage utilization, trend in rangeland condition, and precipitation data." (pg. 11). "Rangeland condition" is currently determined solely by studies relating to forage utilization by livestock. "Precipitation" is the only objective consideration in your analysis.

The purpose of monitoring is to determine trend in range condition and the need for adjustments in livestock permitted use. The RMP/EIS goes on to explain that, "Actual livestock use figures supplied by the operators would be the foundation for grazing management adjustments." (pg. 11). Considering that permittees wholly depend on the permitted use levels for loan collateral and ranch resale value (pgs. 47 & 48), it seems imprudent at best to base livestock adjustment decisions on "figures supplied by the operators."

271-3

Also under monitoring on page 11 you state, "B.L.M. would also design studies to ensure that wildlife habitat management objectives were being met." The wording here indicates that such studies have not yet been designed. When will this occur? What methods and standards will be used?

Pg. 15- It is interesting to note that your description of the "Resource Production Alternative" includes the following: "The issues would be resolved in a manner that would place highest priority on livestock forage utilization..." In defense of my earlier assertion that the driving element of the proposed action is to sustain dependent livestock operations, ^{I offer} this and the following quote also from page 15, "Grazing management objectives for this alternative (Resource Production) would be the same as the proposed action." (Emphasis added).

Response - Letter 271

271-1

Rangeland monitoring studies would provide information critical to managing and refining the rangeland and wildlife programs and provide the basis for making needed adjustments. These adjustments will be based on monitoring data and severity of any resource use conflicts.

271-2

The Lower Gila Monitoring Plan is available in the Lower Gila Resource Area of the Phoenix District Office for review.

271-3

Monitoring for wildlife habitat condition and trend will utilize accepted techniques, many of which can be found in U.S. Fish and Wildlife Service Publication "Estimating Wildlife Habitat Variables" 81-47 (Sept. 1981). BLM personnel have found frequency quadrat techniques are particularly useful in measuring range trend in the Lower Sonoran Desert Habitats. Monitoring will begin when the RMP is finalized, although BLM is already engaged in monitoring critical habitat of the Sonoran pronghorn.

Pg. 19- Rangeland Management. This whole section on range-land management is so shallow and contradictory that I can only guess the B.L.M. planners didn't think anyone would read this document carefully.

You state that, "All grazing allotments in the Lower Gila South RMP/EIS area have been assigned to two of three management categories..." The two categories are: "Maintain" and "Custodial". I challenge the accuracy of these assignments. Appendix 12 pg. 269 describes these categories thusly:
The "Maintain" category encompasses those allotments which meet the following conditions:

- " *Present range condition is satisfactory.
- " *Present management appears satisfactory.
- " *Allotments have moderate or high resource production potential and are producing near their potential (or trend is moving in that direction.)"

The "Custodial" category criteria include the following:

- " *Present range condition is not a factor.
- " *Present management appears satisfactory or is the only logical practice under existing resource conditions.
- " *Allotments have a low resource production potential and are producing near their potential."

First of all, what do you mean exactly by "range condition is not a factor"? How can range condition not be a factor in judging allotments? Also, what is meant by "the only logical practice under existing resource conditions."? Since when is cattle grazing a logical practice under the existing resource conditions in your arid, sparsely vegetated and fragile desert lands?

Secondly, and most importantly, there is no mention of any allotments in need of improvement! You seem to think everything is hunky-dory. Condition, management and trend are all "satisfactory" or are the "only logical practice" under existing conditions. This is absolutely ridiculous.

91% of all allotments are producing at less than 3/4 of their natural "climax" potential. 40% are producing forage at less than 1/2 their natural potential. (Pg. 29 and Appendix 14, pg. 271). 90% of the allotments are classified as either "static" or "declining" in condition trend (pg. 29). You consider this satisfactory?! This is one of the most blatant violations of the resource conservation intent of the Federal Land Policy and Management Act (FLPMA) that I have ever come across.

From what I can gather from the information on page 272, Appendix 15, there isn't a single allotment that shouldn't be placed in the 3rd category called "Improve". This unused category includes the following criteria:

271-4 See response 257-8.

271-5

*Present range condition is unsatisfactory.

*Present management appears unsatisfactory.

*Allotments have moderate to high resource production potential and are producing at low to moderate levels."

The "Improve" category is a perfectly accurate description of the allotments in the Lower Gila South R.A. What realistic justification could you possibly have to completely ignore the "improve" category and classify all your allotments as satisfactory?

If 40% of your allotments are producing forage at less than $\frac{1}{2}$ that of the natural climax conditions, then a "static" trend in rangeland conditions (85% of allotments) indicates either: 1) the resource has been so abused that it is incapable of rejuvenation (certainly the case in many instances and already in violation of the law); or, 2) cattle use is still too heavy to allow natural revegetation and therefore the range is continuously being degraded at a consistent level (arguably in violation of the law).

The B.L.M. is ignoring its responsibility to conserve vegetative, soil and watershed resources and to prevent "unnecessary or undue degradation" of those resources.

There is no excuse for maintaining these deteriorated conditions. Recent rangeland studies show how maintenance of "excellent" range conditions is entirely compatible with properly managed grazing operations. Indeed, it has been well documented that carefully controlled livestock use can actually increase total forage production by stimulating plant growth at the appropriate times.

Proper management protects or enhances the natural resources, and seeks to rapidly reclaim healthy productive conditions on any deteriorated areas. Livestock operations that cannot meet these basic requirements have no business on the public lands.

Pg. 20- Under your discussion of temporary permits for ephemeral grazing, you stipulate that such permits will be issued "...only if the overall rangeland condition were fair or better." This is unacceptable. "Fair condition" means that forage production is between 26-50% of the natural potential. These are significantly degraded sites which ought to be off limits to livestock for recovery purposes.

Ephemeral permits ought to be issued only for ranges producing within 75-100% of climax conditions.

271-6

Pg. 28- You refer to a 1968 document entitled "Special Ephemeral Rule." I would like to receive a copy of this B.L.M. publication. Under these rules you state that, "livestock grazing is permitted on ephemeral allotments only when sufficient precipitation and temperatures provide the probability of an ephemeral forage crop to exist." (Emphasis added).

271-5

Many of the allotments in Lower Gila South do not have moderate to high potential for vegetation production nor do opportunities for positive economic returns exist. Also see responses 257-8 and 270-10.

271-6

See Appendix 2B of this document.

271-7

I am most curious about the wording here. Are you suggesting that a mere "probability" is sufficient to justify the issuance of an ephemeral permit? Is an on-site pre-decision inspection not required? How do you monitor the accuracy of your decisions regarding "probability"? And how do you monitor compliance with the stipulations of the ephemeral permit?

Pg. 27- Perhaps the most significant shortcoming of the B.L.M.'s entire rangeland management program is revealed in its admission on p.27, bottom, "Currently, no allotment management plans (AMP's) have been developed for any of the allotments in the RMP/EIS area." This simple statement sums up the pitiful condition of the B.L.M.'s grazing program. Range management is in evident infancy in this Resource Area.

Not only are there no AMP's, but there is almost a complete lack of reliable data on the interactions between domestic livestock and native wildlife, vegetation and ecosystem health and stability on these allotments.

More problems of this sort are revealed on p. 29 in the statement, "Since trend studies have not been completely established within the area, apparent rangeland trend was determined during the rangeland inventory conducted in 1980 and 1981." (Emphasis added.) And in the next paragraph, "the apparent rangeland trend information represents only a single year's observations and thus may not reflect the actual long-term trend of an area."

Given the admitted bias on page 2, where the B.L.M. asserts that its aim is to stabilize the livestock industry; and given the fact that the Proposed Action seeks to place the highest priority on livestock forage utilization (see comments on p. 15 above); one might reasonably assume that the hasty and incomplete studies on range condition and trend would err in favor of livestock operations, if they err at all.

Coupled with the reputation the B.L.M. has of being "cooperative" toward ranchers, my conservative judgement leads me to believe that you probably have an even greater problem in condition and trend that your simple studies indicate.

(In fairness to the B.L.M., I must admit that a big part of the problem has been the historic lack of funding for studies. It would be much cheaper, however, and more cost efficient to deemphasize livestock and turn the attentions of "range managers" back to the range resources. All that is being focused on now is cattle, which is not a "range resource." Soil, water, vegetation, wildlife, ecological interactions, etc. are the range resources.)

271-8

Pg. 42- Desert Pavement Soils. There is some discussion here of how fragile and susceptible to erosion Desert Pavement is. The RMP/EIS then mentions that three grazing allotments "contain large areas of these soils." You further mention that "the areas are not suitable for livestock grazing." Are the cattle fenced out? or allowed to roam at will? If they are not fenced, how do you plan to protect these soils from damage?

271-7

Authorization may be issued to operators on allotments designated as ephemeral on the basis that climatic conditions indicate probability or potential of an ephemeral forage crop. Probability may be determined to be high when favorable precipitation occurs during fall and winter months of the previous year. Field exams are conducted when there is a question concerning forage availability, trespass, or resource damage. However, range specialists monitor ephemeral forage during field inspections during the ephemeral season to assure that forage exists. See response 289-2.

271-8

See response 257-26.

271-9 No mention is made of what steps you will take to restore the 1500 acres of Desert Pavement currently classified in a condition of "severe erosion". (pg. 43)

Pg. 43- Five (presumably riparian) washes are mentioned as being in "severe-critical erosion condition" due to "heavy livestock use" and periodic excessive water flows. No mention is made of your plans to correct this condition. Riparian areas are rare and critical habitat, especially in this area. To allow instability and degradation of riparian resources to occur and to neglect to outline in the EIS specific plans to rectify the situation is another grave shortcoming in your management and planning.

Pg. 53- The EIS states that adjustments in livestock numbers will be planned "in cooperation and consultation with the livestock operator and other affected groups." As an "affected group", the Sierra Club is interested in being involved in rangeland management decisions. We would particularly like to participate in the development of allotment management plans.

271-10 Pg. 55- In a paragraph discussing range management in wilderness areas you state, "Construction of new rangeland developments is permissible when it is determined to be necessary for the purpose of effective management of the rangeland." This is incorrect. Within a wilderness, new developments must be justified according to whether they primarily benefit or improve the wilderness resource. They must also be constructed in such a way as to minimize impacts to the wilderness. Development merely for the sake of "effective management of the rangeland" is not allowable. (If the B.L.M. does allow this, it is inconsistent with the Wilderness Act.)

271-11 Finally, on page 68, under Recreation Economics, you make a wholly indefensible statement about the value of added recreation visitors to the local economy from wilderness designations. Your figures of 4650 R.V.D.'s and \$17,763 expenditures added for recreation, comes to less than \$4.00/R.V.D. Nearly all major studies in the past decade have placed R.V.D. values at 2 to 10 times your value, depending on the recreational activity. Wilderness recreation always ranks particularly high in value.

Your proposed range management program, wildlife management program and wilderness recommendations in the RMP are negligent and completely unacceptable. The "Environmental Protection Alternative" is the overall preferable alternative. Under no circumstances should the Proposed Action be implemented.

We look forward to significant changes in the Final EIS. If the District Office is interested in discussing these issues further in some sort of negotiation/resolution process, the Sierra Club will gladly participate.

We appreciate the opportunity to participate in public land management planning (such as it is).

271-9 The 1,500 acres of desert pavement soils which are in severe erosion condition class are scattered in the planning area (5 to 2 acres in size). Stabilization will take place on a case by case basis as funding is available.

271-10 As stated in BLM's Wilderness Management Policy 46 FR 47180, Sept. 21, 1981, and Forest Service Regulations (36 CFR 2937), and 43 CFR Part 8560. "... wilderness designation should not prevent the maintenance of existing fences or other livestock improvements, nor the construction and maintenance of new fences or improvements which are consistent with AMPs and/or which are necessary for the protection of the range.

271-11 See response 1-2.

Wildlife1) Wildlife as a planning priority

According to the draft RMP/EIS, "BLM's wildlife program in the lower Gila South RMP/EIS area was not identified as a major issue" (p. 22). This position is unacceptable. Wildlife is one of the multiple uses which the BLM is mandated to serve in its management. Because of the large tracts of unspoiled land within this management area, the Lower Gila South RMP area is ideally suited for serving the needs of Arizona's desert wildlife. Yet little evidence exists in the RMP/EIS that a wildlife program exists at all. The management plan is excessively directed towards the interests of mining and grazing.

In accepting wildlife as a priority, the BLM must consider not only the requirements of threatened and game species, but also the needs of the natural communities of flora and fauna which exist within the RMP area. Game and threatened species must be seen as integral parts of their associated communities. By focusing on the ecosystems, the individual members will also be protected. In fact, attention to natural communities provides a reliable index to the health and productivity of the lands. BLM management should be based on a standard of healthy natural communities.

2) Habitat diversity

The extent of all habitat types within the management area should be quantified. This has been done only for the wilderness study areas, in which just two habitat types are identified. The EIS states that the RMP area is composed primarily of two habitat types - creosote bush/bursage and palo verde/mixed cacti. However, smaller areas of several other habitat types are also recognized (e.g. riparian associations, tobosa grass-scrub, saltbush, mesquite thickets). These associations may comprise small percentages of the planning area. However, their very scarceness makes it imperative that they be identified and quantified. Small and isolated associations of flora and fauna often are critical to their residents and users.

In addition to delineating more precisely the current habitat types, the RMP/EIS should specify the impact of any proposed habitat manipulations, such as those associated with mining, grazing, or utility corridors, on the various habitats affected. Would these manipulations result in any conversion of ecosystem types, or loss of acreage from any particular habitat type? Such specification is particularly critical with respect to the less widespread ecosystems referred to above. For example, what is the extent of the tobosa grass-scrub association in the South Vekol Valley? Would any of this be protected in wilderness? What would be the impact on this ecosystem of the proposed levels of grazing and mining?

271-12

Management of Riparian Habitat along the Gila River, which is comprised of saltbush and Sonoran deciduous swamp and riparian scrub, will also be addressed in LGS/HMP. These habitats are found in the Fred Weiler Green Belt, which is an issue in the RMP but could not be adequately addressed at this time. Management of the Green Belt will be addressed in LGS/HMP or in a future document specific plans for the Green Belt.

Acres of Habitat types have been quantified in the management situation analysis for LGS. Refer to Chapter 3, Wildlife in this document for a table outlining habitat types.

Habitat management of the unique Tobosa Grassland will be addressed in the upcoming LGS Habitat Management Plan. Public involvement will be solicited in development of the HMP including suggestions for the management of this area.

3) Wilderness as protection for wildlife

By preserving large tracts of unspoiled lands, and thereby protecting intact ecosystems, wilderness designation is often the most effective means of protecting and managing wildlife. This is particularly true for non-game, non-threatened species, which otherwise are given little individual attention.

4) Impact of grazing of wildlife

Overgrazing adversely impacts the health and diversity of all natural ecosystems. Overgrazing must be eliminated (grazing use must be aligned with capacity). All grazing allotments should be managed to achieve good or excellent condition. This will benefit grazing as well as wildlife.

5) Riparian areas

The RMP/EIS states that no perennial streams exist besides the Gila River, but that some springs do exist. Because of the scarcity of perennial water sources, these springs must be critical for native wildlife. We support the BLM policy of excluding cattle from developed spring storage and adjacent riparian habitat (p. 23). However, we would extend this to exclude cattle from all perennial water sources, including the riparian habitat along the Gila River. Despite their depositing scarified mesquite seeds, the impact of cattle on riparian areas is detrimental. Riparian habitat is very much a limited resource in the Lower Gila South; it should be preserved for wildlife and recreation.

6) Monitoring wildlife

The RMP/EIS includes no plan for monitoring wildlife. Monitoring is critical for evaluation of the health of the different habitat types within the RMP area, and provides an important index to the achievement of management objectives. We recommend that the BLM adopt a program of monitoring indicator species. This would entail the development of a list of species which are representative of and dependent on the various habitat types represented in the management area. The population levels of these species should be monitored on a regular basis (every 1-2 years). Because many animal populations naturally vary widely in number from year to year, we also recommend a complementary system of monitoring vegetation structure. Vegetation could be monitored at less frequent intervals (every 5 years). Because of the sensitivity of vegetation structure to grazing and mining, this program would constitute an effective guide to the health of the ecosystems within the RMP/EIS area.

271-13 See Response 271-3

271-13

Wilderness

We question the priorities of the BLM in recommending only portions of 4 out of 12 WSA's for wilderness. The BLM is mandated to manage its lands for multiple uses. Wilderness designation preserves intact ecosystems, provides for long-term maintenance of scenic qualities so important for quality recreation, protects watersheds, and preserves historically important cultural sites. Release from wilderness, on the other hand, caters to the interests of only a small portion of the population, the miners. We argue that designation of lands as wilderness serves the interests of a greater proportion of the population, and does so in more diverse, more lasting, and more fundamental ways.

The RMP/EIS provides little justification for its recommendation to release the 8-plus WSA's from wilderness. All of the WSA's are described as providing outstanding opportunities for solitude and unconfined recreation, and must have significant cultural features or habitat for threatened wildlife. None is described as having mineral development potential greater than moderate, and several are described as having low mineral potential. For example, the South Maricopa Mountains are described as "essentially natural... Outstanding solitude and primitive and unconfined recreation opportunities... supplemental wildlife... and cultural resources" (p. 34). The WSA has 42,800 acres of crucial desert tortoise habitat. The area has low potential for mineral development. Yet, none of the 71,320 acres of this WSA is recommended for wilderness, and a large portion of it is even recommended for management of VRM class IV. The Butterfield State Memorial WSA is similarly described, and similarly recommended. No justification is provided for such recommendations. Wilderness quality is a resource which is irrecoverable once lost; the BLM must provide compelling justification for recommendation against wilderness; such justification should be included in the EIS for each WSA.

We are particularly concerned at the recommendations for the five WSA's abutting and extending from the Kofa Wildlife Refuge. This set of WSA's (New Water Mountains, Little Horn Mountains West, Little Horn Mountains, Eagletail Mountains, East Clanton Hills) represents the opportunity to significantly extend a large tract of unspoiled land. Of these five WSA's, only portions of two are recommended for wilderness, and one of these (Eagletail Mountains) without the inter-connecting lands. The moderate mineral potential in the WSA's cannot justify their removal from wilderness.

In determining the value of wilderness for wildlife, the RMP/EIS essentially considers the impacts only on desert bighorn sheep and desert tortoise, and occasionally on a sensitive plant species. Even these considerations appear to have little impact on the BLM recommendations. Yet, one great value of wilderness

is that it preserves entire ecosystems intact. Given our rudimentary understanding of the dynamics and potential resources of desert ecosystems, this preservation of intact ecosystems should be a great incentive towards wilderness designation. This significance should be discussed in the EIS, and given adequate weight in the recommendation process.

The RMP/EIS recognizes that wilderness designation would increase the number of visitor days per year for each of the sites. How were the estimates of changes in visitation rate generated? Why is there a greater projected increase in use under the Resource Protection Alternative than under the Environmental Protection Alternative? The EIS must consider that the five major SMSA's closest to the WSA's are all growing rapidly; visitation rates are likely to increase annually. The RMP/EIS values each increased visitor-day at less than \$4.00. How was this figure determined? It is an unjustifiably low valuation, insupportable by any valid study on R.V.D. values, particularly those related to wilderness recreation.

271-14

There is a greater projected increase under the Resource Protection alternative because that alternative, to a great extent, accommodates both existing motorized and increased nonmotorized recreation uses within WSAs recommended for wilderness. Under the Environmental Protection alternative, all motorized based recreation use is prohibited in 12 wilderness areas. Therefore, visitor days in WSAs associated with such use are lost.

Wilderness designation is the only management guideline which ensures long-term stability of ecosystems. Long-term perpetuation of healthy ecosystems in turn ensures continued productivity. This long-term productivity can be considered analogous to a resource output, and should be considered accordingly in balancing priorities for wilderness designation.

Finally, we reiterate our support for designating all WSA's as wilderness. However, in the event that any of the WSA's are not designated as wilderness, these lands should be managed for VRM class II or I whenever possible. None of these lands should be classified as VRM class IV. The areas are currently all pristine enough for VRM I designation; this natural character cannot be reclaimed once lost, and must be preserved.

271-14

RECREATION

The recreation values in the Lower Gila South RMP have been downplayed as in almost all BLM planning. BLM's primary emphasis is obviously grazing and mining, and values such as recreation (particularly primitive recreation) and wildlife are secondary. Recreation economic increases from primitive recreation is continually referred to as an insignificant amount viewed on a regional level, but you went into minute detail on ranch economics. You should note that even in your conservative recreation value estimates in the RMP, the economic increases projected from increased primitive recreation exceed total ranch profits.

Recreational use of BLM lands in the Lower Gila South area is not higher because the BLM has done little to encourage or develop it. The Lower Gila South offers exceptional primitive recreation opportunities - large WSA's with unique flora, fauna, geologic values, and cultural resources - stunning scenery. Interpretive centers and trails, as well as maps and publications should be developed and made available to the public. This area is within less than a days drive of five major expanding metropolitan areas which are over-using recreation areas adjacent to them. Areas such as Lower Gila South should be used to disperse recreation.

The Environmental Protection Alternative would best meet the recreation requirements for the Lower Gila South area. It would designate 30% of the BLM area Wilderness for primitive recreation and leave 70% open to motorized and other non-primitive uses. Table 4-8, pg. 66 gives an erroneous report on this balance. It gives percentages on the assumption that the WSA's are the only lands available for non-primitive use which is a false assumption.

ORV use is the only recreational value inhibited by the Wilderness designations in the Environmental Protection Alternative and it would be very destructive in the WSA areas. It unfortunately would still be permitted on the remaining 70% of the fragile land in the Lower Gila South area. The wilderness protection afforded 607,557 acres in the Environmental Protection Alternative would protect wildlife and scenic values for hunters, hikers, photographers, birders and other wildlife observers, geology buffs, and other enjoyers of scenic and primitive places.

On page 181, Table S-14 you conservatively estimate that recreation would be maximized with the Resource and Environmental Protection Alternatives (up 52-59 % over present use.) I believe this is conservative with the growing demand for primitive recreation and with five major expanding metropolitan centers within easy reach.

In summary, the Environmental Protection Alternative is the preferred alternative for balanced recreational values. Also, interpretive and educational services should be developed for the area.

271-15 Please refer to Chapter 3 - Affected Environment, Recreation.

271-15

CULTURAL RESOURCES

Management of the Lower Gila South Planning Area under the proposed resource management plan would have disastrous effects on the cultural resources present. Cultural resources will be adversely affected by multiple use management in areas that have not been adequately inventoried. The proposed action has a definite bias toward mineral development, ORV use, utility corridors, and grazing. This bias will have permanent detrimental effects on the myriad cultural resources present in the area. Cultural needs were not given the consideration they deserved. The proposed action places more importance on "possible" mineral finds than on existing culturally important sites.

Mineral and energy "possibilities" are the basis for the management plan of each WSA. The BLM admits its lack of information on mineral and energy resources in the RMP/EIS. No oil or gas production, leaseable mineral production, or geothermal production have taken place in the RMP/EIS area. The area has a poor potential for saleable minerals. Placer claims have not been productive.

Only 1.26% of the RMP/EIS acreage has been formally inventoried for cultural resources. 390 sites have been found and additional traditional cultural/ religious sites have been identified by Native American groups. As many as 20,350 sites could occur in the RMP/EIS area. No testing has been done to identify subsurface sites. Lack of summary reports of cultural resource areas make it inadvisable to release land to multiple use management without further study. The proposed action makes it clear that the BLM is willing to release unstudied land with a high probability of cultural resources to the uses that would be most detrimental to any existing known or unknown site. Surface disturbances can totally destroy the context and artifacts of cultural sites. Surface disturbances are likely to occur under multiple use management. The degree of impacts to sites has not been adequately monitored or measured.

The statistics given for cultural resources saved and conclusions about user impact are misleading. The culturally sensitive acres protected by the proposed action are 55% of the recommended acreage for wilderness. This is only 47.5% of the cultural resources present in the RMP/EIS area. The resource protection alternative would protect 66.6% of the culturally sensitive acreage in the RMP/EIS area. The environmental protection alternative would protect 100% of the identified sensitive areas.

271-16

As stated in the draft RMP/EIS Chapter 2, page 21, before proposals involving areas of ground disturbance or transfer of title are approved, site specific cultural resource evaluations will be completed. These include a Class I literature review, as well as a Class II or Class III field inventory in areas which have not been previously surveyed for archaeological remains.

Subsurface testing on sites or areas to identify possible subsurface remains is performed when: 1) a site or portion of a site will be adversely affected by a proposed action and mitigation or data recovery is required and, 2) an area with a high probability to yield subsurface remains is selected for a proposed action. As stated on Page 44 of the draft RMP, Simonis (1982) of the BLM performed an archaeological testing program along the Gila River. Some testing has been performed to identify possible subsurface remains.

All significant archaeological sites on lands under multiple-use management are protected from destruction as stated in the draft RMP/EIS Chapter 2, page 21. The second paragraph states that before any action involving surface disturbance . . . an infield survey for inventorying any cultural resources will be conducted. Any sites located will be evaluated for their eligibility to the National Register. In most cases, projects are redesigned to avoid significant cultural resources. When this is not possible, the BLM in consultation with the SHPO determines appropriate mitigating measures. In this manner, surface disturbances to cultural

271-17

User impact has been estimated with a bias favorable to mineral development, ORV use, utility corridors, and grazing. Not one of the WSAs is free from some impact from one of the above uses. These impacts have occurred while the areas in question were in a relatively protected study condition. What will happen when the wilderness study constraints are lifted? A large proportion of the cultural sites exist on desert pavement. These sites are extremely vulnerable to surface disturbances from ORV use, mining activities, road construction, and cattle trampling. Multiple use management would allow new roads, increased mining and ORV use, and utility corridor construction. The cultural resources of the area could be gone forever. The New Water Mtn. WSA and the Eagletail Mtn. WSA currently exhibit signs of vandalism. The East Clanton Hills WSA, Face Mtn. WSA, and Tabletop Mtn. WSA all show signs of site disturbance from mining and ORV use. A habitation site has been excessively disturbed by road building in the Signal Mtn. WSA. All cultural areas of the Woolsey Peak WSA show some signs of disturbance from mining and erosion. The Little Horn Mtn., Little Horn Mtn. West, North Maricopa Mtn., South Maricopa Mtn., and Butterfield Stage Memorial WSAs all have high potentials for cultural site disturbances from the aforementioned groups. The proposed action does not provide enough protection to the important cultural resources present in the RMP/EIS area. How are these sites to be protected from destruction?

Important traditional cultural/religious sites were virtually overlooked in the proposed wilderness recommendations. Wilderness would preserve these areas of high religious subsistence significance in their natural state. The important areas are the Gila Bend, Eagletail, and Maricopa Mountains. The Gila Bend Mountains are part of the East Clanton Hills WSA, the Signal Mtn. WSA, and the Woolsey Peak WSA. These mountains are important to the Yavapai, Maricopa, Pima, and Papago. The Eagletail Mountains and WSA are important to the Yavapai and Maricopa. The Maricopa Mountains are part of the North Maricopa and South Maricopa Mtns. WSAs and the Butterfield Stage Memorial WSA. These mountains are important to the Pima, Sand Papago, and Maricopa. Only the Woolsey Peak and Eagletail Mtn. designation would provide additional protection. Why were cultural needs ignored? Land management plans must consider historic and cultural preservation if the BLM's stewardship of our heritage is to be effective.

Specific cultural sites are glaringly left unprotected in the proposed action. A large petroglyph site eligible for the National Register is to be left out of the Eagletail wilderness recommendation. Vandalism from increased ORV use could cause its permanent loss. The Face Mtn. WSA contains an extensive archaeological district which has been nominated to the National Register of Historic Places. This area has not been recommended for wilderness. Face Mtn. WSA should be included in the wilderness system. Wilderness would provide protection from casual destruction. The remnants of the Butterfield Stage Route should be preserved in the North Maricopa Mtn. WSA and Butterfield Stage Memorial WSA.

271-17

sites are avoided, reduced, or mitigated. Previous impacts to sites are measured when evaluations of sites in a particular project area involving ground disturbances are completed. In addition, known sites which are eligible for inclusion in the National Register are monitored periodically to determine if any vandalism or impacts have occurred. Present and past impacts to all sites recorded during the Class II sample survey of WSAs were adequately recorded and reported on.

Sites currently in the WSAs will be managed under the multiple-use management concept if certain WSAs are not designated for wilderness. Under multiple-use management concept policies and guidelines, as discussed in No. 1 and No. 2 in response 271-16 and in the draft RMP/EIS Chapter 2, page 21, will be carried out.

There are very few differences in the management policies of WSAs and land under multiple-use management in regards to cultural site preservation. Mining, road construction, and cattle disturbance from range developments constitute ground disturbing actions, each of which would warrant a Class III field inspection for significant cultural resources, as well as a Class I literature search. Appropriate measures, as stated in the draft RMP/EIS Chapter 2, page 21 and detailed in BLM Manual 8111, provide for the protection of cultural resources on BLM lands managed under the multiple-use classification.

The proposed action addresses four major issues, all of which will have the same management constraints for protecting

This is a historic route of regional importance.

The fragile nature of cultural resources should be a major concern in land management planning. Irreversible and irretrievable damages will be done to our local, regional, and national heritage unless major emphasis is placed on stopping current destructive uses and abuses of our cultural resources. Additional disruptive uses in the future should not be allowed.

SOILS

Fragile desert pavement soils would not be adequately protected under the proposed action. Soils with slow natural recovery rates would be opened to multiple use management and the high probability of surface disturbances. The proposed action would favor land uses that foster irreversible and irretrievable impacts to the area's soils. Mining, ORV use, utility corridors, and, to some extent, grazing are directly harmful to the soil types present in the RMP/EIS area.

Approximately 150,000 acres of desert pavement exist in the RMP/EIS area. This soil is intolerant to surface disturbance and experiences severe wind and water erosion when damage takes place. Large areas of desert pavement exist in the New Water Mtn. WSA, Little Horn Mtn. West WSA, Little Horn Mtn. WSA, and South Maricopa Mtn. WSA. The East Clanton Hills WSA also has areas of desert pavement. The proposed action would protect only the New Water Mtn.'s desert pavement. All other areas would be opened to multiple uses.

The Little Horn Mtn. West WSA and Little Horn Mtn. WSA are relatively untouched by ORV tracks. Surrounding areas not under study are overrun by ORV tracks. These areas are criss-crossed with mining claims. Release of these lands would subject the desert pavement to the projected increases in ORV use and mining activities. The expected surface damage could not be repaired by the poor soil and low rainfall prevalent in these areas.

The East Clanton Hills WSA exhibits signs of ORV damage although the desert pavement is relatively pristine. Mineral and geothermal activities would damage desert pavement in this area if this area was released for multiple use. ORV use would continue to grow.

The South Maricopa Mtn. WSA is particularly vulnerable to soil disruption. Mineral interest is high in this area although mineral potential and potential for development are low. The shallow, rocky soils and desert plains are easily damaged. Most of the mining claims are on the desert plain where strip mining is a possibility. ORV use is expected to increase under multiple use management.

cultural resources. As stated previously, Chapter 2 - Management Guidance Common to All Alternatives - explains how any significant sites are protected from destruction (see answers No. 1-3 above).

Cultural sites are not unprotected if they are not placed under wilderness management. Any site eligible for inclusion in the National Register, regardless if it has been nominated or not, is afforded protection by various federal laws and regulations. Some of these were listed in Chapter 2 - National Historic Preservation Act of 1966 and the National Environmental Policy Act of 1969. Also the BLM Manual 8141 (Arizona Supplement) provides for agency-specific guidelines for both long-term and interim physical and administrative protection of cultural resources. If vandalism or ORV use is identified as a factor for continued degradation of a significant site, a variety of protective measures (e.g., fencing, ORV closure, locked gates) may be taken to restrict public use of an area. Also 36 CFR 800 provides for the treatment of National Register eligible properties to eliminate adverse impacts by developing mitigating measures.

272

The proposed action would not protect the previously mentioned areas of desert pavement(except New Water Mtn. WSA). It would not protect areas of sensitive soils in the Face Mtn. WSA, Signal Mtn. WSA, Woolsey PeakWSA, North Maricopa Mtn. WSA, and Butterfield Stage Memorial WSA. The latter two are extremely vulnerable because they contain areas of high ORV use. Surface disturbances in the North Maricopa Mtn. WSA are considered "nearly permanent" because of the soil type and steep slopes prevalent in the critical area.

The resource protection alternative would give added protection to sensitive soils in the Eagletail Mtn. WSA. It would protect soils in the Little Horn Mtn. WSA, Face Mtn. WSA, and sensitive North Maricopa Mtn. WSA.

The environmental protection alternative is the only alternative that offers protection to the desert pavement areas present in the Little Horn Mtn. West WSA, East Clanton Hills WSA, and the South Maricopa Mtn. WSA.

Some provision must be included in future management plans to protect the fragile and unique character of desert soils. Disruptive activities must not be allowed to trigger cycles of erosion. Irreversible and irretrievable impacts can be stopped before they happen.

TALIESIN, ASSOCIATED ARCHITECTS
ARCHITECTURE • PLANNING • INTERIOR LANDSCAPE GRAPHIC DESIGN
TALIESIN WEST • SCOTTSDALE, ARIZONA 85261-4430 602 948-6400



Phoenix District B.L.M.
2015 Deer Valley Road
Phoenix, Az. 85027

1 May 1985

Dear Sir:

I am writing to urge that several areas in your jurisdiction be recommended designation as wilderness areas and given that protection. Specifically White Canyon, Mt. Wilson, Coyote Mountains, Baboquivari Peak, Hell's Canyon and Picacho Mountains deserve this protection for various important reasons. I am also concerned that the Little Horn Mountains & Mountains West be included for their bighorn sheep and tortoise population-protection. This consideration should also apply to Signal Mountain and North Maricopa Mountains which of course also contain important early rock shelters.

I would hope that the Baboquivari Peak wilderness would also include the 3,000+ acres of contiguous state land that should be acquired by trade.

I also support wilderness recommendations for Little Horn Mountains & L.H. Mountains West, Signal Mountain, North Maricopa Mountains, Butterfield Stage Memorial, Tabletop Mountains, Woolsey Peak, New Water Mountains, Eagletail Mountains, East Clanton Hills, Face Mountain, and South Maricopa Mountains.

Our Sonoran desert areas are unique and though Congress did designate 1.2 million acres as wilderness in Arizona last year I feel strongly that much more action must be taken soon to assure protection for all the above areas.

Yours sincerely,
Mary C. Nemtin
Mary C. Nemtin

cc: Senator Barry Goldwater
Senator Dennis DeConcini
Representative John McCain
Representative Eldon Rudd
Representative Bob Stump
Representative Morris K. Udall

COMMENTS AND RESPONSES

273

LITTLE RAINBOW VALLEY FLOOD CONTROL DISTRICT
County of Maricopa, State of Arizona

April 24, 1985

Mr. Bill Carter
Phoenix District
Bureau of Land Management
2015 West Deer Valley Road
Phoenix, Arizona 85027

Re: Draft RMP/EIS
Lower Gila South Area
Phoenix District, Arizona

Dear Mr. Carter:

On behalf of the Little Rainbow Valley Flood Control District, we present these comments on the Draft Resource Management Plan/Environmental Impact Statement ("RMP/EIS") for the Lower Gila South RMP/EIS Area.

The Little Rainbow Valley Flood Control District (the "District") was formed under Article 1.1, Chapter 10 of Title 45 of the Arizona Revised Statutes on February 4, 1985. The purpose of the District is to protect farmlands from stormwaters and overflowing flood waters in the watershed area bordered by the Buckeye Hills to the north and the Maricopa Mountains to the east. Those waters collect in large part on public lands under the control of the Bureau of Land Management ("BLM") and eventually flow to the Gila River to the west.

The focus of our comments will be directed to two wilderness study areas ("WSAs") which impact on the flood and drainage control efforts of the District: the North Maricopa Mountains (Unit No. AZ-020-157) and the South Maricopa Mountains (Unit No. AZ-020-163).

In the section on "soil erosion and productivity," the RMP/EIS states on page 43 that:

"Soil erosion from water in the EIS area is generally low due to low precipitation and the gravelly-cobbly soil surface that protects the soil from rain-drop splash and channel runoff. The amount and intensity of rainfall greatly vary, making soil erosion and sedimentation levels difficult to calculate or predict. Sheet and streambank erosion during high-intensity storms cause most soil movement."

Based upon personal observations and experiences of private landowners in the area, occasional storms above the WSAs and other BLM lands cause major accumulations and discharges of stormwaters, along with sediment, to flow from those areas across private lands to the Gila River. The massive area of the WSAs and other BLM lands provide for an enormous collection of stormwaters which cause frequent damage to private property and results in sedimentation of drainageways which requires frequent maintenance at the expense of private landowners.

Response - Letter 273

273-1

The Proposed Action will serve to improve watershed conditions and to reduce flooding and sedimentation. If grazing reductions are determined necessary through monitoring, the subsequent improvement of range vegetation would help stabilize the watershed, reduce runoff, and decrease sedimentation. Similar benefits would occur from enhanced livestock distribution through range improvement projects.

273-2

Floodplain management and wetlands protection will continue as indicated on Page 54 of the draft RMP/EIS. Rangeland projects directed toward watershed improvement and flood control may be authorized given adequate funding, proper environmental assessment, and consistency with applicable Wilderness Management Policy guidelines.

273-1

273-2

Lack of a comprehensive and coordinated floodplain and watershed management programs covering both BLM and private lands have resulted in severe soil erosion, deterioration of drainage-ways, and unnecessary damage to the environment and to private property. For those reasons, the District strongly encourages BLM to undertake mitigating measures which are appropriate under these circumstances.

The conditions described above present a definite hazard to life and property, in addition to causing a depreciation of environmental quality both on the WSAs and other BLM lands as well as on private lands. The District solicits the cooperation and assistance of BLM in formulating and preparing a comprehensive flood and drainage control study and in constructing and maintaining necessary water-regulating structures on BLM lands.

In respect to the North Maricopa Mountains and South Maricopa Mountains WSAs, the District supports the recommendation of BLM in not designating those areas as wilderness under the Proposed Action. The District further endorses the recommendation that those areas be subject to multiple use management, including the installation of and access to necessary control/release structures and diversion channels as may be required for environmentally sound floodplain and watershed management.

Thank you for this opportunity to express these concerns on behalf of the District and we hope they will be given careful consideration during the formulation of the Final Management Plan and Statement.

Sincerely,

Doug C. Nelson

Douglas C. Nelson, P.C.
Legal Counsel
Little Rainbow Valley Flood Control District

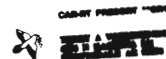
DCN/pg

Mr. Bill Carter
April 24, 1985
Page 3

c: Mr. William T. Childress
Area Manager
Lower Gila Resource Area

Board of Directors
Little Rainbow Valley Flood Control District

276



6034 N. Kachina Ln
Scottsdale AZ 85253

May 1, 1985

Gentlemen,

I am deeply concerned about encroachments on our public land. Desert areas in Arizona represent unique settings and should be preserved for future generations. Those of us familiar with areas such as White Canyon, Hell's Canyon, Mt. Wilson and the Coyote Mountains are anxious to see them preserved. ^{the} Pecos Mountains too should be spared from development. I support wilderness recommendations for all the above. Yours truly
Helen Volchinski

COMMENTS AND RESPONSES

278



GEORGE E. JOHNSTON
KING RANCH BOX 1702 A
APACHE JUNCTION, ARIZ. 85220

May 1, 1985

Phoenix District BLM
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Gentlemen:

I am writing this letter to urge that you give further consideration to recommending for Wilderness designation, the following areas:

White Canyon	Mt. Wilson
Coyote Mountains	Baboquivari Peak
Hell's Canyon	Picacho Mountains
Little Horn Mts.	Signal Mountain
No. Maricopa Mts.	Tabletop Mts.
Woolsey Peak	New Water Mts.
Eagletail Mts.	East Clanton Hills
Face Mountain	So. Maricopa Mts.

In several cases, the reasons given for not recommending some of these areas has been "off-road intrusions." If these are no longer allowed, these areas will "heal" themselves...even if it does take 100 or more years to do so. Once these lands are cut adrift, there is no hope of their salvation.

As for the copper mining potential...they can't give the stuff away! I live in what was once one of the beauty spots of the world...and all that's left is that part of it which has been designated "wilderness." I'm speaking of Superstition Mountain, which now has its western and southern flanks despoiled with the worst kind of development!

Please...let's save what we can of our national heritage. Even if, as wilderness areas, they will be readily accessible only to the young and healthy (I'm 65 years old). The rest of us can get "close" and enjoy these areas not only in our own lifetimes but can get satisfaction that they will be there for generations to come.

Thanks for listening.

Sincerely,

George E. Johnston
George E. Johnston

279

3326 E. Elida St.

Tucson, AZ. 85716

May 2nd 85

Yuma District BLM.
Yuma az.

Sirs:

*Please don't destroy our
grandchildren's natural, national
heritage.
Please leave our wilderness
lands intact.*

*Please listen to the Naturalists
like the Audubon Society.*

*The list of canyons and areas is
too big to list but leave them
alone, in their natural form.*

a tax payer.



Sincerely,

Peggy Slater
RECEIVED

281

May 2, 1985

District Manager,
BUREAU OF LAND MANAGEMENT
Phoenix District Office
2015 W. Deer Valley Rd.
Phoenix, Arizona 85027

Re: LOWER GILA SOUTH - Resource Management Plan
Environmental Impact Statement

Dear District Manager:

Please include these comments as part of your public input record. Thank you.

The subject area in the Arizona desert has an average rainfall varying from 3-10 inches. Therefore, I find it hard to understand that cattle grazing will get increased from 60,524 AUMs to 61,900 per the "Proposed Action" alternative. Eliminating livestock grazing, according to "Environmental Protection" alternative would be beneficial to the vegetation resources and wildlife. Even now the livestock operators are not contributing any significant part to Arizona's total personal income. The historic Arizona economy included cattle in 1929 but today, agriculture (farming and ranching) contributes less than 2% of Arizona's personal income. The question must be asked: Is it worth it? The answer here seems to be NO. Attached to my comments is a 7-page report by the Bureau of Business and Economic Research in Arizona State University's College of Business Administration showing 1929 to 1983 data.

The low price of grazing fees on BLM land is also a big subsidy I do not support. This subsidy has been going on for almost a hundred years. It is time to stop the abuses on the public's funds and abuses on the public lands. I strongly urge the 47% reduction to 31,914 AUMs as proposed in the "Resource Protection" alternative.

Using the same attached 7-page report, it will be seen that the Arizona mining industry has been declining in significance ever since its high of 16% of Arizona's personal income, in 1929. Today, Arizona's mining industry contributes less than 2% to Arizona's personal income. It should be seen then that mining in the Lower Gila South area is not worth the damage it causes. I heartily urge that the "Environmental Protection" alternative be applied to mining.

Off-road vehicles in Arizona, unlike the declining industries, are increasing. I find them noisy, dirty, and their operators generally showing a low regard for Arizona's natural beauty. Sometimes I have come across groups of ORV enthusiasts, including families with children of all ages and individuals, tearing up a desert area, resembling a battle scene. Even if ORVs were prohibited in the entire 12 WSAs (607,557 acres) that would still allow ORVs on the remaining area and that is too much. There are plenty of places for ORVs near Arizona's two largest cities, Phoenix and Tucson (in the usually dry Salt and Santa Cruz rivers), where most of the ORVs are in Arizona. ORV areas in the Lower

Gila South should be restricted to dry washes or areas BLM feels can take these destructive vehicles.

I am not sympathetic to wild horses and burros and am concerned about their impacting forage and water supplies for native wildlife.

I endorse the "Environmental Protection" alternative recommending all 12 WSAs as wilderness areas. Arizona continues to be one of the nation's fastest growing states and yet the most highly urbanized with increasing pressure on our natural recreational areas. More wilderness areas are needed for the public, not less. Also, wilderness areas are important to tourism, Arizona's second largest industry.

According to Arizona's tourism director, tourism attracts 16.2 million visitors who spend \$5 billion a year, producing \$230 million in tax revenue and providing 71,700 jobs directly related to tourism and 114,600 in indirect fields. It would be short-sighted from an economic standpoint alone to not designate the maximum 607,557 acres as wilderness.

Aside from the significant economic considerations, I love the desert and I am excited that I could enjoy beneficial impacts on wilderness and associated resource values (botanical, cultural, wildlife) enhanced by a wilderness protection designation, and that knowing my children's children would be able to enjoy these areas also.

Cultural Resources: We should always be aware that research and study is not complete on Arizona's prehistoric people and we are not aware of what places are still used today by our native people culturally and religiously.

Thank you for this opportunity to comment on your draft Lower Gila South Resource Management Plan/Environmental Impact Statement.

Sincerely,
Carolina Butler
Mrs. Carolina Butler
11837 N. Paradise Drive
Scottsdale, Ariz. 85254
(602) 948-6824

Attach.

The Decline of Arizona's "Four Cs"

The historic Arizona economy has been described as the "four Cs": copper, cattle, cotton and citrus. While it is widely acknowledged that other industries have gained significance recently, especially high technology manufacturing and tourism-oriented services, many still consider the old mainstays of the Arizona economy to be important.

To answer the question of whether these characterizations of the Arizona economy are accurate, a consistent set of data available over a long time period is needed. Of the best measures of the Arizona economy - Gross State Product (GSP), employment, personal income (PI) - only the latter is available by industry for a number of years (since 1929, from the U.S. Department of Commerce).

The Arizona Economy in 1929

The four Cs characterization of the Arizona economy was relatively accurate in 1929, according to the PI data: The agriculture and mining industries together contributed nearly one-third of the state's personal income. Even then, however, the PI derived from the services and trade industries was nearly as much as from agriculture and mining.

In comparison to the national economy in 1929, mining and agriculture were much more important to the Arizona economy; manufacturing was the most important industry nationally. In contrast, the services and trade industries were no more important to the Arizona economy than to the national economy. Thus, the four Cs did fairly describe the Arizona economy in 1929, particularly in comparison to the national economy.

The Decline of Mining and Agriculture

The Arizona mining industry has been declining in significance ever since 1929 (see Figure I). Its share of PI fell to less than 7 percent in 1932 from more than 16 percent just three years earlier. Except preceding and during World War II, mining's share of PI remained at approximately 6 percent until it began a slow decline around 1960. Even during the copper boom of 1981, mining contributed less than 4 percent of Arizona's personal income; its contribution now is just 2 percent.

The mining industry had remained somewhat more important to the Arizona economy than to the national economy until 1983. Now, Arizona mining's share of Arizona PI is no greater than national mining's share of national PI.

The Arizona agriculture industry did not begin to decline until much later than the mining industry. Its peak year was in 1951, when it accounted for 23 percent of Arizona's personal income. Its portion has been falling ever since, however, to less than 8 percent by 1958, to 2 percent by 1983. The Arizona agricultural industry has not been more important to the Arizona economy than the national agriculture industry has been to the national economy since the early 1960s.

The actual output of these industries has not necessarily declined: Except for cyclical down swings, the inflation-adjusted GSP of both agriculture and mining has been increasing. This growth, however, has been much slower than that of Arizona's other industries. The explosive growth of the state's urbanized areas has overwhelmed these rural industries.

In some parts of rural Arizona, mining and/or agriculture remain the dominant forces of the local economy. In these areas, such as portions of Gila, Graham, Greenlee, Pinal and Yuma counties, a slump in mining or agriculture can be devastating to the local area. But because the population of these areas is so small, these problems barely affect the state as a whole.

The Growth Industries

The combined share of Arizona personal income of the agriculture and mining industries has declined from 32 percent in 1929 to 4 percent in 1983. Three industries in particular have grown, replacing most of this lost share.

Government was the first industry to gain in importance, with its share of PI rising from less than 10 percent in 1929 to more than 20 percent in 1932: a result of the depression. During World War II, when military operations expanded in Arizona, government's share of PI briefly exceeded 33 percent. Since the early 1960s government's portion of PI has remained near 20 percent; it contributed the largest part of Arizona's personal income each year from 1961 through 1982. (Government's share of GSP, however, was only 14 percent, ranking it as the fifth largest industry). Compared to the contribution of government to the national PI, the Arizona government share of Arizona personal income has been slightly higher.

During the 1950s, Arizona's manufacturing industry began to expand. It usually had contributed less than 7 percent of Arizona personal income until 1951, while the national manufacturing industry was contributing more than 25 percent of U.S. PI. By 1960, the PI derived from manufacturing was nearly 14 percent of the state's total; manufacturing had achieved an 18 percent share of PI by 1980, still not as large as that nationally.

The Arizona services industry has also grown, but to a lesser extent. Excluding cyclical fluctuations, the services industry accounted for approximately 18 percent of Arizona PI from 1929 through 1960, approximately the same share as nationally. Both in Arizona and nationally, services' share of PI has increased since 1960, especially during the last few years.

The Arizona Economy Today

Arizona now has a diversified economy, one much different than in 1929 (see Figure II). While manufacturing, especially that related to high technology, and services are the most rapidly growing industries, the government and trade sectors still contribute comparable shares of Arizona personal income. If GSP is used as the measurement base, the finance, insurance and real estate industry must be added to this group. The Arizona industrial structure is much like the national structure, except that manufacturing is a little less important in Arizona while construction and government are slightly more significant.

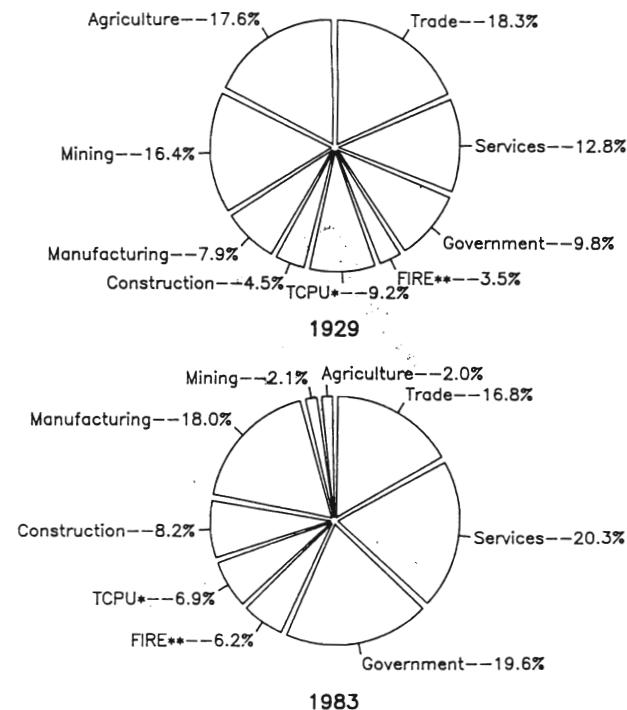
Conclusion

It is simple, but accurate, to say that the four Cs (agriculture and mining) used to be important to Arizona. Mining declined first, replaced by government. Agriculture declined more recently, replaced by manufacturing and, later, also by services. Agriculture and mining seem doomed to continue their relative decline, though neither can fall much farther since each contributes only 2 percent of Arizona personal income.

These changes in the Arizona economy did not occur recently. By the middle 1960s, the economy's structure already closely resembled that of today. Recognition of these changes has been slow, however. The importance of the manufacturing and services industries has only recently been realized while the problems of the mining and agriculture industries still garner considerable attention.

Tom R. Rex
Research Manager

THE SHIFT IN ARIZONA'S INDUSTRIAL STRUCTURE Sectoral Share of Arizona Personal Income



* TCPU = Transportation, Communications, and Public Utilities
** FIRE = Finance, Insurance, and Real Estate

Source: Bureau of Business and Economic Research
College of Business
Arizona State University

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX
215 Fremont Street
San Francisco, Ca. 94105

MAY 02 1985

Marlyn V. Jones, District Manager
Bureau of Land Management
Phoenix District Office
2015 West Deer Valley Road
Phoenix, Arizona 85027

Dear Mr. Jones:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled LOWER GILA SOUTH RESOURCE MANAGEMENT PLAN; MARICOPA, LA PAZ, YUMA, PIMA AND PINAL COUNTIES, ARIZONA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of Rating Definitions and Follow-Up Action"). This DEIS is rated EC-2 because 1) water quality and air quality issues need to be addressed, 2) pesticide use should be discussed, 3) possible conflict between grazing and wildlife habitat should be resolved and 4) environmental benefits of additional wilderness areas should be considered. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send five copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Juli Jessen, Federal Activities Branch, at (415) 974-0257 or FTS 454-0257.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy and Management

Enclosure (3 pages)

Response - Letter 282

282-1

Water Quality and Air Quality - these two issues were not addressed in the draft RMP/EIS because none of the actions proposed would have a significant impact, beneficial or adverse, on either the air or water quality of the area.

282-1

-214

Water Quality Comments

1. The FEIS should provide baseline information and a detailed map of water resources within the area. The FEIS should discuss the following resources, indicating management measures to protect water quality:
 - a. Springs and wells
 - b. Ponds and reservoirs
 - c. Perennial streams and hydrographic basins
 - d. Riparian communities.
2. Under the sections Affected Environment (Chapter 3), Environmental Consequences (Chapter 4) and Wilderness Supplements (Chapters 3 and 4), discussions of wildlife resources should specifically include wetland habitats. Although impacts to riparian vegetation are discussed under several of the alternatives, this vegetation type represents only one kind of wetland habitat potentially found in the Resource Management Area. Other wetland types that should be identified include, but should not be limited to, marshes, tule beds bordering stock ponds and reservoirs, seeps and springs, wet meadows, playa lakes, etc. Potential impacts to these wetland habitats under each alternative should be discussed in detail. If there are no potential impacts to wetlands under the alternatives, this should be substantiated.
3. Numerous species of waterfowl and shorebirds are stated as using riparian habitat on the Gila River and, to a lesser extent, stock reservoirs in the Vekol Valley (p. 39). Heavy cattle grazing is identified as currently limiting the importance of Vekol Valley reservoirs as waterfowl habitat. However, Table 4-2 identifies no long term adverse impacts to riparian habitat, waterfowl or Vekol Valley grassland under any alternative. The FEIS should explain why adverse impacts to these habitat types and species will not continue.
4. The environmental protection alternative proposes improvement of the Vekol Valley grassland, including the dike system which contains important waterfowl habitat. The proposed action of the FEIS should also consider this improvement.
5. Mitigation to protect water quality and maintain beneficial uses for each water resource discussed, especially riparian communities, should be included in the FEIS.

Air Quality Comments

1. The FEIS should provide baseline information for existing air quality in the resource areas.
2. The DEIS states that none of the alternatives will significantly impact air quality (p. 53). However, alternatives vary widely in activities permitted and therefore will impact air quality differently. The FEIS should discuss the kinds of air quality impacts which could be possible under the different alternatives and how these impacts would be mitigated.

Pesticide and Herbicide Comments

1. Any pesticide use should be discussed with respect to its effect on fish and wildlife, particularly endangered species. Appropriate precautions should be included in the discussion.

2. If pesticide or herbicide use is proposed, the FEIS should indicate that the compound is:
 - a. Registered with EPA
 - b. Registered for the specifically proposed use
 - c. Marked with a current label
 - d. Applied by a certified applicator or by personnel under the direct supervision of a certified applicator
 - e. Used in accordance with all state and federal laws
 - f. Applied in such a way that precautions are taken to protect workers during the operation.
3. The FEIS should discuss the use of pesticides or herbicides in relation to the following topics:
 - a. Cattle-dip treatment
 - b. Fire prevention programs
 - c. Predator control programs
 - d. Deer repellent programs
 - e. Wood preservative treatment for fences
 - f. Vegetation control near roads and right-of-way corridors
 - g. Control of disease vectors such as fleas.
4. The FEIS should address the following considerations for the safe use of pesticides or herbicides in the project area:
 - a. Provisions for mixing, storing, loading and disposal of pesticides or herbicides
 - b. Spill prevention contingency plans (SPCP)
 - c. Adverse effects on nontarget species
 - d. Applicator safety and prespraying notification procedures
 - e. Impacts on aquatic resources
 - f. Current status of the pesticide or herbicide to be used
 - g. Alternative means of achieving desired management goals.

General Comments

1. Although 10% of the rangeland is in poor condition (p. 29) and erosion is a problem (p. 63), no management practices are outlined for improvement of these areas. Allotment categories are limited to "custodial" or "maintain." The FEIS should include a category for rangeland needing improvement and describe Best Management Practices for this land.
2. The DEIS traces soil erosion (p. 63) and adverse impacts on big game (p. 59) to cattle population. Yet, the proposed action alternative allows grazing to continue at its present level or to increase (p. 9). Even the resource production alternative recommends initial herd reduction (p. 15). This may indicate that the proposed action fails to balance multiple uses and instead favors grazing activities. The FEIS should propose a more balanced approach.
3. Establishment of wilderness areas can benefit other resource and environmental values such as water quality, air quality and soil condition. By adding 134,600 acres of suitable wilderness to the 189,750 acres designated by the proposed action, the resource protection alternative prevents several adverse impacts on environmental and wilderness values. In evaluating the resource protection alternative the DEIS states on page 79 that "all seven areas recommended suitable [by this alternative] are considered manageable as wilderness over the long term." Due to the lesser impacts and manageability of the wilderness areas, EPA recommends that BLM reconsider the acreage proposed as suitable for wilderness designation.

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

Environmental Impact of the ActionIO—Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEO.

Adequacy of the Impact StatementCategory 1—Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEO.

*From: EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment

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Public Lands Institute

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May 3rd, 1985

Mr. Marlyn V. Jones, District Mgr.
Phoenix District Office,
2015 West Deer Valley Road
Phoenix, ARIZ. 85027

RE: Lower Gila South
RMP/EIS

Dear Mr. Jones:

Pursuant to your letter of January 2, 1985, the Public Lands Institute, a division of the Natural Resources Defense Council, has reviewed the above-mentioned document.

In brief, we support the limited, proposed wilderness designation for portions of four of the WSAs under consideration. These are identified as portions of the New Water Mountains, Eagle-tail Mountains, Woolsey Peak, and Table Top Mountains. We are disappointed to find that the "suitable" wilderness acreage recommended by your staff totals only 189,750 out of a possible 607,557 acres identified for the 12 potential WSAs.

After review of the document, it is obvious that in each and every case, the Phoenix District has either ignored or deliberately downplayed the essential resource values that clearly merit wilderness designation. These include, but are not limited to, the presence of significant, sensitive cultural resources, identification of important riparian habitat for fish and wildlife, habitats for threatened state-listed species, the outstanding potential for primitive recreational experiences, and the real opportunities all twelve areas have for solitary outdoor experiences.

It appears that the Phoenix District bowed to the ever-present pressures of the mining and ranching interests in releasing roughly 69 percent of the lands under consideration and study. This percentage is even higher than the national average of BLM areas released as "unsuitable" as analyzed in a recent PLI Newsletter. A copy is attached for your information.

Further, your team of specialists failed to even consider an important provision under your 1976 Organic Act, the Federal

Response - Letter 284

284-1 BLM fully recognizes the value of wilderness for the protection and enhancement of wilderness, for the protection of wildlife, plant, cultural, and scenic resources. The supplemental wilderness values protected or benefited by wilderness designation are fully described in the document.

These resources will be protected by other means if the areas are not designated wilderness. All environmental constraints required by law would be applied. Possible constraints include specific laws and regulations which require BLM to protect threatened and endangered plant and animal species and cultural and visual resources. BLM is also required to manage the public lands to prevent unnecessary and undue resource degradation.

284-2 The Lower Gila South RMP/EIS is just one of five DEIS documents containing wilderness recommendations for public lands in Arizona. These five draft documents have preliminarily recommended almost 558,000 acres in 23 areas as suitable for wilderness, approximately 33% of all lands initially identified as wilderness study lands in Arizona. Additional wilderness studies will begin in Arizona in 1986 involving about 600,000 acres in 23 units.

Letter to Marilyn V. Jones, page two

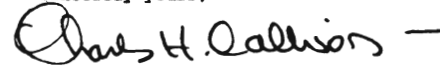
Land Policy and Management Act. It requires the agency to designate and protect special areas with unique resources in a special way and, at the same time, would allow for certain compatible commercial uses. Such areas have been identified in other states as "areas of critical environmental concern" and all twelve of the WSAs identified in your planning effort would more than qualify or have portions that would qualify. I enclose a copy of a study recently published by the Public Lands Institute that clarifies the intent of Congress in this regard.

It is truly regrettable and even incomprehensible that in all of Arizona, BLM has yet to find a single area for designation as an ACEC. Equally incomprehensible, in reviewing the document we find not a hint that this special provision in the law was even considered in all of your extensive planning efforts.

The Public Lands Institute is dedicated to turning this situation around, and we are committed to working within the intent of Congress and the framework of the law to secure BLM compliance.

In closing, we recommend that you complete your cultural resource inventories before any final release of any of these special areas for such uses as mining, oil exploration, off-road vehicle use, and other exploitive purposes.

Sincerely yours,



Charles H. Callison
Director

All Audubon and Sierra Club
Chapters in Arizona

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BUREAU OF LAND MANAGEMENT
PHOENIX, ARIZONA
MAY 8 1982

285

4/29/85
Box 1264

William K. Barker, Dist. Mgr.
Phoenix District BLM
Phoenix, Az.

Dear Sirs:

I feel that the areas in Arizona
proposed as wilderness areas be left as they presently
are: Multiple Use Areas.

There are already vast areas now in
game refuges, reservations, military installations,
gunnery and bombing ranges that are restricted or
forbidden to the general public. Making more areas
into wilderness areas further reduces what area is
left to those people who do not have the time,
energy or ability to hike in or could not afford the
services of guides and outfitters.

I feel it would also unduly prohibit
and restrict the development of any natural resources
that may be in or discovered in these areas.

Thank you

Jonathan Adams

Mary L. Davis

Box 1264

Quantzite, AZ. 85346

APR 30 1985
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289

YUMA AUDUBON SOCIETY
P.O. Box 6395
YUMA, ARIZONA 85364

May 5, 1985

Marlyn Jones, District Manager
Phoenix District Office
U.S. Bureau of Land Management
2015 W. Deer Valley Road
Phoenix, AZ 85027

Dear Mr. Jones:

The following are Yuma Audubon's comments on the Draft Resource
Management Plan/Environmental Impact Statement for the Lower
Gila South RMP/EIS Area.

RANGELAND MANAGEMENT

We feel that the critical issues in rangeland management for
this plan are ephemeral grazing, wildlife-cattle conflicts,
classification of allotments, and when to initiate changes in the
number of livestock using the public lands.

Ephemeral Grazing

We request that ephemeral livestock grazing be eliminated from
the area covered by this proposed plan. BLM advises us (EIS, pp.
59-60) that 9 of these ephemeral allotments either have high
potential for transmission of disease to Bighorn Sheep or forage
conflicts between cattle and Desert Tortoises. They are: Artex,
Dendora Valley, Gila River Community, Hazen Sheppard, Jagow
Kreager, Layton, Mumme, Palomas, and Powers Butte. These
allotments represent only those with the highest potential for
conflicts.

We feel that ephemeral vegetation should be allowed to play its
natural role in an ecosystem to which its constituent animals
have adapted. It is our understanding, for example, that Desert
Tortoises are highly reliant on annuals and breed only in years
of relatively abundant vegetation--the same years that BLM
proposes to let cattle remove this vital vegetation.

The EIS states that ephemeral grazing will be allowed only when
"such use does not conflict with other resources or damage the
perennial vegetation base" (p. 27). But how does BLM define
"conflict" and "damage"? What "other resources" are taken into
consideration? How are the conflicts resolved and the damage
repaired? Furthermore, ephemeral grazing is permitted based on
PROBABILITY of abundant vegetation, not actual occurrence (EIS,
p. 27). We feel that there already is abundant evidence that

289-1

Response - Letter 289

289-1 | conflicts of ephemeral grazing exist with other resources. And what is the rangeland condition and trend in the ephemeral allotments? This information is not furnished in the EIS.

289-2 | BLM should also look at the effect of ephemeral grazing on species besides those mentioned in the EIS. For example, research by Danita Hardy of the University of Arizona indicates that green vegetation, but not water, is a limiting factor in reproduction of Round-tailed Ground Squirrels (Journal of the Arizona-Nevada Academy of Science, Proceedings Supplement, p. 25, 1985).

289-3 | The EIS should also indicate how frequently these ephemeral allotments have been used.

We feel that all of the above justifies our request for elimination of ephemeral grazing in the Lower Gila South planning area.

Perennial/Ephemeral Grazing

289-4 | BLM's rangeland management goals (EIS, p. 9) are vague. Areas in poor to fair condition are to be improved, but to what level? How long will this take? There should be a specific overall date by which time improvement must take place. This could vary for individual allotments, since some could recover more rapidly than others. We feel that BLM's goal should be to return all allotments to excellent condition as soon as possible and eliminate all conflicts with wildlife, especially rare, threatened, and endangered species (Federal or State lists).

BLM already has abundant evidence of cattle-wildlife conflicts and adjustments should be made now, not some time in the future. For example, 5 sensitive plant species have already been adversely affected by cattle trampling and grazing (EIS, p. 29). BLM already knows that cattle using washes compete with deer, eating the same plants (EIS, p. 59). BLM already knows that cattle compete for vegetation with Bighorn Sheep and transmit devastating diseases to the wild sheep (EIS, p. 59). BLM already knows that cattle compete with Sonoran Pronghorn for food (EIS, p. 60). BLM already knows that cattle compete with Desert Tortoises for food and can depress tortoise reproduction (EIS, p. 60). BLM already knows that cattle eat cottonwoods (EIS, p. 60). And BLM states that reduction in number of cattle would accelerate habitat improvement and wildlife recovery (EIS, p. 17). All these factors call for reduction in cattle numbers now, not after 5 or more years of monitoring.

289-5 | We also fail to understand why BLM permits grazing in desert pavement areas of the Crowder-Weisser, Eagle Tail, Palomas, Bighorn, and Artex allotments (EIS, pp. 42-43). In the same section BLM states that desert pavement soils "are not suited for livestock grazing" (EIS, p. 43).

289-1 BLM determines the extent of conflict and damage of any surface disturbing activities through the environmental assessment process. Resources such as wildlife, botanical, cultural and watershed values are evaluated and any detrimental impacts from the activity would be mitigated or not allowed.

289-2 Ephemeral allotments produce little perennial vegetation and annual vegetation varies from year to year. BLM's rangeland inventory was conducted to determine base line data for estimating vegetation production potentials. BLM through its ephemeral designations has determined that ephemeral allotments do not have potential for perennial vegetation production and do not have yearlong herd numbers attached to them.

289-3 Livestock use of ephemeral allotments varies from year to year depending on precipitation, ephemeral forage conditions and the economic conditions of the livestock operator. On the average, livestock utilize ephemeral ranges three years out of ten.

289-4 Rangeland within the Lower Gila South planning area varies greatly in potential and response to management actions. High producing range sites are intermingled with low producing which make it difficult to manage along with unpredictable weather patterns. For analysis purposes, excluding areas within 1/4 mile of perennial water sources, rangeland in poor and fair condition

- 289-6** We are skeptical of BLM's classification of allotments and proposals for improvements. Twelve perennial-ephemeral allotments are proposed for "Maintain" status, which implies that present range condition is satisfactory and there are no serious resource use conflicts or controversy (EIS, p. 269). Yet 11 of these allotments have conflicts with one or more wildlife species (Sentinel is the exception) (EIS, pp. 59-60). Even Sentinel is 47% poor or fair condition, two of the "Maintain" allotments have 50% or over in poor to fair condition (Crowder-Weisser and Hazen) and two other allotments (Cameron and Childs) have over 40% poor to fair condition. Condition trend on these allotments is overwhelmingly static (EIS, Appendix 15, p. 272). Thus we fail to understand how BLM finds no conflicts on these allotments and satisfactory range condition.
- The allotments with the worst condition and/or greatest conflicts with wildlife are Cameron, Crowder-Weisser, Gable-Ming, Hazen, and Kirian.
- Cameron is 41% poor to fair condition, 97% static and 3% downward trend, and has conflicts with Mule Deer, Bighorn Sheep, and Sonoran Pronghorn. We find all these factors calling out for immediate improvement in conditions, not waiting for five years of monitoring. The Pronghorn, an endangered species, could be gone by then.
- Crowder-Weisser is 50% poor to fair condition, 8% downward trend, 89% stable trend, and has conflicts with Bighorn Sheep and Desert Tortoise. Again, improvement is needed now, not five years or more from now.
- 289-8** Gable-Ming is 73% poor to fair condition and 100% static trend. This is dismal. There are also conflicts with Bighorn Sheep and Desert Tortoise. Again, immediate improvement is needed.
- Hazen is 55% poor to fair condition and 100% static with conflicts with Bighorn Sheep and Desert Tortoise, and Kirian is 44% fair condition, 86% static, and has conflicts with Bighorn Sheep and Desert Tortoise. All these allotments have either conflicts with two or more species of wildlife and/or 40% or more poor to fair condition class with predominantly static or even some downward trend. It would be foolish for BLM to wait five years or more to take action to improve the quality of the habitat in these areas.
- 289-9** We also question the value of the proposed improvements. BLM's analysis shows only "slight improvement" of rangeland condition and trend resulting from the Proposed Action (EIS, p. 24). For the amount of money being spent (\$371,345), we would expect more than just slight improvement. Moreover, the Proposed Action would benefit primarily medium and large ranches. This means the small rancher would be no better off as a result of the Proposed Action. (EIS, p. 67). BLM should do a benefit/cost analysis on

would be expected to improve to fair and good in the long term (5 - 25 years) depending on climate, effectiveness of management and funding.

For analysis purposes rangeland in poor and fair condition would be expected to improve to fair and good condition in the long term (5 - 25 years), depending on climate, effectiveness of management and funding.

289-6 See response 257-8.

289-7 The vegetation data has been used to identify and analyze impacts and mitigation of the proposed action and alternatives. We recognize the shortcomings of a one year rangeland inventory. While this data is adequate for purposes of planning and analysis, they must be supported by the results of monitoring studies before making forage allocation decisions.

289-8 No entire allotment is designated crucial bighorn sheep or desert tortoise habitat, and cattle do not occupy only bighorn or desert tortoise habitat. While potential conflicts have been identified with wildlife on some allotments, rangeland conditions in the fair range would not indicate a shortage of wildlife feed but rather that less than 50% of the natural plant community species exists. Through monitoring specific conflicts will be identified between wildlife and livestock. Once studies are evaluated, conflicts would be mitigated.

289-9 BLM will conduct benefit/cost analysis for all proposed rangeland developments.

the proposed improvements.

289-10 We recommend against the proposed improvements. Their sole purpose seems to be to disperse cattle into areas where they have not grazed, thus destroying more habitat. We especially request that cattle be kept out of the Ranegras Plain (the Eagle Tail and Palomas allotments) because the vegetation there is lush (EIS, p. 37). We also request that no development of waters for cattle and no fencing be allowed in Bighorn Sheep habitat because of detrimental effects to the sheep.

Table 4-2 (EIS, p. 61) appears to us to overstate as beneficial the long-term impacts to wildlife under the Proposed Alternative, specifically the effects of grazing management level on Bighorn Sheep, Desert Tortoise, Sonoran Pronghorn, and Riparian Habitat. We certainly don't think a person would come to these conclusions from reading the text.

If and when rangeland condition improves, we feel the increased vegetation should be for the benefit of wildlife that has suffered because of poor or fair range conditions. This has been going on for many years.

289-11 Although we disagree with the Proposed Action for grazing, we would like to know which "other resources" are considered in determining whether an increased level of grazing could be authorized under the monitoring plan. How are these "other resources" to be considered? What weight will "other resources" be given? This is unclear.

We also feel that BLM should carry out studies to ensure that wildlife requirements are being met in ALL areas, although we could support more intensive studies of riparian areas and areas with listed or sensitive species, such as the Sonoran Pronghorn.

Finally, we feel that the Conclusion paragraph of the Impacts on Vegetation section on p. 55 of the EIS is inadequate and vague. It leaves out a lot.

WILDERNESS

While the EIS recommends some excellent areas for wilderness, we feel that BLM should recognize an opportunity to recommend virtually contiguous areas which would create one of the finest wilderness experiences in the United States.

By recommending the Little Horn and Little Horn West, Eagletail, and East Clanton Hills WSAs, BLM could help create a large wilderness area which would provide tremendous solitude and outstanding opportunities for primitive recreation. Moreover, Bighorn Sheep, which need relatively large areas for their existence, including migration routes, would be protected by designating these areas wilderness.

The Face Mountain, Signal Mountain, and Woolsey Peak WSAs create a similar opportunity, as does wilderness designation of the North Maricopa Mountains, South Maricopa Mountains, and Butterfield Stage Memorial WSAs.

Most of the WSAs have only low to medium mineral potential or development potential (EIS, p. 129). The areas that do have high potential have in 2 out of 3 cases been recommended for wilderness by BLM (Eagletail Mountains and Table Top Mountains). We think this is excellent in that BLM has recognized the wilderness values of these two WSAs.

Surely the other WSAs with lower mineral potential and great wilderness value could be recommended.

In many cases, BLM's descriptions of the WSAs provide more than enough reason to designate non-recommended WSAs as wilderness--the description of the Little Horn Mountains West WSA on p. 31 of the EIS is one example ("essentially natural," "Jumbled arrangement of hills and low mountains separated by small canyons provide outstanding opportunities for solitude," "Good but not outstanding opportunities for primitive and unconfined recreation"--but are these opportunities not outstanding especially when the Little Horn West and Little Horn WSAs are considered at the same time? Only a road separates the two areas from being one.

289-10 Rangeland developments are used to control livestock distribution, thus helping to improve or maintain the vigor and density of major forage plants and to harvest these plants efficiently. Impacts to critical wildlife habitat will require assessment and mitigation prior to development of an improvement.

289-11 When monitoring data reveal permanent increase in forage available for livestock grazing, the additional forage will be allocated in a manner consistent with multiple-use management objectives.

We also feel it is important to include bajadas and plains below the mountains to give integrity to the wilderness areas as natural and recreational units. Part of the enjoyment of wilderness hiking and backpacking is gradually approaching the mountains in the distance until they loom before one and present details that could not be observed from the distance--details of rock formations, plants, the shining sand grains of the washes. Moreover, including the flatter areas also protects Bighorn Sheep range, and the sheep are very sensitive to human disturbance. This is why we recommend BLM include all of the New Water Mountains WSA, not just the mountainous part. Wilderness can be not only up and down but planar as well, enhancing the experience by providing a variety of topography.

While we feel all WSAs are worthy of designation, we would especially like to mention one of our favorites, the North Maricopa Mountains, South Maricopa Mountain, and Butterfield Stage WSAs. We have always been impressed with the high quality of the environment in these WSAs, with their lush vegetation. If these areas were closer to Tucson they would be part of Saguaro National Monument. BLM should designate them wilderness.

We are somewhat confused about BLM's rationale for recommending wilderness areas. In the Proposed Alternative (pp. 58-59) the EIS states that although wilderness opportunities would be lost by not designating all WSAs under consideration in the EIS, BLM feels that those recommended for designation would offset

289-12

adverse impacts to wilderness in Arizona. However, on p. 79 of the EIS, under the Resource Protection Alternative, BLM states the same thing, but more WSAs are recommended for wilderness. If the areas recommended under the Resource Protection Alternative merely offset adverse impacts to non-recommended WSAs, how can the smaller amount of wilderness recommended under the Proposed Action offset adverse impacts to wilderness? We fail to understand BLM's reasoning here, and also how BLM measured adverse impacts to wilderness resulting from non-designation against beneficial impacts resulting from designation. What criteria were used and how specifically did BLM arrive at these conclusions? We note that the EIS states (p. 59) that non-designated areas have moderate to high potential for degradation of natural values. This is all the more reason to recommend all the WSAs for wilderness.

289-13

We feel that any WSA not designated wilderness by Congress should be made an Area of Critical Environmental Concern (ACEC) to recognize its outstanding natural values and very often high values for certain species of animals and plants.

LAND TENURE ADJUSTMENT

289-14

While we are glad to see BLM prefers land exchanges to land sales (EIS, p. 12), nevertheless we feel that there should be no erosion of the public land base. BLM should dispose of no more land than is acquired. None of the alternatives in this EIS propose to acquire as much surface estate as would be disposed of. We thus recommend that BLM cut back on the amount of land designated for disposal and acquire all lands listed under the Environmental Protection Alternative. In general we are opposed to BLM land sales as this decreases the public land base and the money goes for general government purposes rather than benefiting the public lands.

The EIS provides no real alternatives for land disposal, other than the No Action Alternative, since the amount of land is always the same (73,123 acres). Yet the amount of land to be acquired varies by alternative. We think BLM should provide land disposal alternatives with varying amounts of land in order to create real alternatives.

We also request that BLM determine resource values of land BEFORE designating it for disposal (see EIS, p. 12). Determination of resource values is an important step in evaluating the suitability of public land for disposal.

We request that BLM NOT dispose of the following lands proposed for disposal:

289-12

The impacts addressed, involve the ability of designated areas to offset adverse impacts to diversity in the National Wilderness Preservation System (NWPS). Overall impacts to the diversity of the NWPS are not considered significant under the proposed action or resource protection alternatives. No other types of impact are addressed here. The section will be rewritten to clarify the issues addressed.

289-13

Impacts from nondesignation were developed by analyzing existing and potential land uses in each WSA, including patterns of ORV use, mining claim distribution and mineral potential, and the potential for other types of land use to occur both beneficial, neutral or detrimental to wilderness values. Wilderness, cultural, scenic, wildlife and plant resources were determined to benefit from wilderness because of the general prohibition of surface disturbance and generally less human interference with natural ecological processes.

289-14

The listing of 73,123 acres of land was done in order to establish an exchange base that is varied enough to interest the state and private land owners. This will be necessary in order for us to implement the exchanges necessary to acquire the valuable resource lands listed. This does not mean that 73,123 acres will be disposed of.

--> Any land in the Gila River and its historically defined floodplain. The following are among parcels which may be located in this area: T. 4 S., R. 4 W., Secs. 8 and 21; T. 5 S., R. 4 W., Sec. 7; T. 1 S., R. 5 W., Sec. 35; T. 5 S., R. 11 W., Sec. 33; T. 6 S., R. 12 W., Sec. 26; T. 6 S., R. 13 W., Secs. 27 and 28; T. 7 S., R. 13 W., Sec. 7. If BLM is going to exchange land along the Gila River, we feel that BLM should acquire the river bed, historic floodplain, and riparian vegetation and only dispose of isolated parcels outside of the Gila River historic floodplain.

--> Lands that include Waterman Wash or its major tributary from the southeast, namely, T. 4 S., R. 1 E., Sec. 9; T. 3 S., R. 1 W., Secs. 21, 22, 23, 25, 28 and 36, because of the high resource values of large washes;

--> Lands that include Vekol Wash or its major tributary from the southwest, namely, T. 6 S., R. 1 E., Secs. 2, 10, 11, 15, 21, 27, 28, 32, and 33; T. 7 S., R. 1 E., Secs. 3 and 5, because of the high resource values of this major wash to southern Arizona;

--> Any lands in T. 1 S., R. 2 W., because they include the foothills and bajada of the Sierra Estrella, and to protect the western edge of the Sierra Estrella from encroachment. The Sierra Estrella should be retained as a natural area for the appreciation of residents of the Phoenix area and to recognize the unique qualities of this range, including its vegetation, some of which reaches range limits in the Sierra Estrella.

--> T. 6 N., R. 16 W., Sec. 7, which includes Cunningham Wash, a major wash and significant habitat area;

--> T. 6 N., R. 16 W., Sec. 29, which includes Bouse Wash, a major wash and significant habitat area.

We also request that BLM NOT dispose of any lands which contain moderate to high potential or occurrence of cultural resources. These lands need protection from destruction of cultural resources sites through development.

The criteria for designating parcels for disposal are unclear, except in a general sense. Do the enclosed maps accurately reflect land tenure in the Lower Gila South area? We found parcels proposed for disposal not shown in yellow on the large map (e.g., T. 6 S., R. 12 W., Sec. 26, NE 1/4 and N 1/2 NW 1/4). Should T. 4 N., R. 15 W., Sec. 36 be Sec. 35? It would have been helpful if BLM had prepared a map showing areas designated for disposal and acquisition, but we appreciate inclusion of legal descriptions of the parcels being proposed.

289-15

It is unclear why some parcels are proposed for disposal and not others in the same section. An example is T. 7 S., R. 12 W. Why does BLM propose to retain the N 1/2 NW 1/4 of Sec. 34 when the rest of the section is proposed for disposal? There are a number of other such examples.

We commend BLM for proposing acquisition of subsurface estate in areas where the United States owns the surface estate. Even though split estate WSAs are again under consideration for wilderness, we recommend that BLM set as a priority acquisition of subsurface estate in WSAs.

BLM should acquire the full estate to all riparian areas along the Gila River for wildlife purposes and also to prevent development in flood-prone areas.

Unfortunately, a major weakness of this EIS is that no Areas of Critical Environmental Concern are proposed. In fact, the Federal Land Policy and Management Act (FLPMA) requires that the identification and designation of ACECs is to be given PRIORITY in the development of land use plans (Public Law 94-579, Sec. 202(c)(3); 90 Stat. 2748). If the ACEC issue is not included in the Lower Gila South RMP, the plan would fail to meet the requirements of FLPMA, thus nullifying the whole RMP. BLM thus needs to identify potential ACECs and make recommendations as to their suitability for such status.

289-15

The particular example pointed out lies in an area where we are trying to dispose of an isolated parcel in a section but also within that section are some public lands with significant resource values that need to be retained. In this case it is riparian habitat along the Gila River that is being retained.

ACECs are needed in the Lower Gila South planning area for the protection of wildlife values, ecosystems, and cultural resources. We do not feel that ACECs should be used as a substitute for wilderness designation in areas of wilderness quality.

One example of an area that needs ACEC status is the Mokel Valley Grassland outside of the Table Top WSA (including the variety of amphibian species present). Other examples are areas of protected plants listed in Table 3-1 (EIS, p. 30). Another area suitable for ACEC status is the Gila River channel and its riparian vegetation. Certainly the Sonoran Pronghorn and Organ Pipe Cactus habitat near Ajo are worthy of ACEC designation. The Sierra Estrella should be protected as an ACEC, recognizing the unusual plants that occur there, often at boundaries of their distribution: Arizona Rosewood, *Yucca elaeagnifolia*, Desert Olive, *Forestiera*, shrub, *Standleya*, Mohave Sage, *Silene mohavensis* (Greene). We would also like to see BLM use the expertise of its biologists and archaeologists to come up with recommendations for ACECs in the Lower Gila South planning area, based on their intimate knowledge of this area.

The Lower Gila South planning area needs an off-road vehicle (ORV) route plan. The EIS proposal to leave all areas open to cross-country travel (except wilderness) is an invitation to destruction of the resources of the area. BLM should restrict travel to designated routes. At the least, the Lower Gila South area should be consistent with the proposals for ORV travel of the Yuma ELM District and the Tonto National Forest. It is even more curious that BLM's proposal for unlimited ORV access comes in the absence of any demonstrated demand for such access. We also feel that ORV races are inconsistent with BLM's mission to protect resources and manage land for multiple uses. Thus we

request that BLM not authorize any ORV races in the Lower Gila South area.

The conclusion paragraphs on land uses (EIS, p. 59) are too general, ignoring the value of some land parcels proposed for disposal. We also are unclear of the goal of the BLM-State land tenure adjustments. These need to be explained in more detail.

UTILITY CORRIDORS

We are strongly opposed to designation of the Palo Verde-Devers 500 kV line route as a utility corridor. This corridor would run through the Kofa National Wildlife Refuge and we feel a mile-wide corridor is inconsistent with refuge purposes. It would also impact administratively endorsed wilderness study areas in the Kofa Refuge, an impact which was ignored in this EIS.

After the recent examination of utility routes resulting from the All American/Celeron crude oil pipeline EIS, we are surprised that BLM would recommend the route through the Kofa refuge as a utility corridor. The documentation from the All American/Celeron EIS clearly demonstrates the unacceptable adverse impacts of running more utility lines through the Kofa Refuge. The fact that All American was willing to take the slightly longer and more expensive I-10 route also demonstrates this.

Moreover, we understand the Kofa Refuge is opposed to more utility lines through the refuge. It would be unproductive to set up a utility corridor that would be a constant source of dispute between two federal agencies (BLM and FWS), state agencies, environmental groups, and applicants for utility routes. The idea of utility corridors is to achieve agreement that routings for utility proposals will be processed with a minimum of delay and controversy. The Palo Verde-Devers route would not achieve this goal.

We also request that BLM propose designated communications sites, as this will help all concerned in planning for future actions.

WILDLIFE

Some of our concerns and comments about wildlife appear above. We emphasize that BLM should improve habitat for Bighorn Sheep, Mule Deer, Desert Tortoise, Sonoran Pronghorn, and riparian habitat to excellent condition by removing livestock-wildlife conflicts.

We commend BLM for some excellent proposals concerning wildlife. Specifically, we are glad to see BLM's consideration for State-listed species, such as in Wildlife Program Management Guidance #2 (EIS, p. 20) and the proposal not to dispose of land with habitat for State-listed species (EIS, p. 54).

We would like to see BLM give more consideration to protected plant species in the RMP. For example, BLM should not dispose of any land with protected plant species (Federal or State), not just animal species.

BLM should also develop a plan for revegetation of the Gila River with native vegetation. We think that releases from Painted Rock Dam should also be regulated in order to promote establishment and maintenance of native riparian vegetation. This would also benefit the Gila River below the Lower Gila South planning area.

Since BLM states (EIS, p. 53) that "... impacts to protected and sensitive plant species are difficult to define because of lack of site-specific information" we believe that this EIS requires a worst case analysis of impacts to such vegetation, until and unless BLM obtains site-specific information and can realistically estimate impacts to the vegetation as a result of the RMP.

We appreciate BLM's proposal to provide cattle exclosures for wildlife waters developed in conjunction with cattle watering sources, but we would rather see cattle-wildlife conflicts reduced following our proposals in the section on Rangeland Management above.

We also feel that the degree of effect on wildlife from fences should set the priority of modification, not whether BLM feels the fence condition requires replacement or maintenance. It is conceivable that the worse the condition of the fence, the better it could be for large mammals.

We are especially concerned that Clapper Rail habitat be established and protected along the Gila River since they will breed in this area. We also are concerned that egret and heron habitat be protected along the Gila River.

We also feel that BLM should mitigate for Gila Monster and Kit Fox loss of habitat by setting up ACECs to manage for their habitat types.

MINERALS AND MINING

The table on p. 24 of the EIS should also show how much area outside wilderness or WSAs remains open to mining. The number of claims in the planning area outside wilderness or WSAs should also be shown in order to give better perspective to the minerals issue.

Similarly, the EIS would give a better perspective in the section on the affected environment (p. 41) by presenting information on mineral potential and known mineral resources outside the areas proposed for wilderness under the various alternatives.

CULTURAL RESOURCES

Areas with high probability of stratified sites should be protected from disturbance by ACEC designation. The farther west one goes in Arizona the rarer stratified sites become and the Lower Gila South planning area also represents the zone of contact between Hohokam and Patayan. Stratified sites in this area are of tremendous archaeological significance.

289-16

Any sites eligible for the National Register should be protected as ACECs. How many sites in the Lower Gila South planning area have been evaluated for eligibility? Similarly, the petroglyph site mentioned on p. 44 of the EIS should be designated an ACEC. We know of an outstanding petroglyph site along the Gila River (not Painted Rocks) that should be designated an ACEC. Since this may be the same site referred to on p. 44 and it appears BLM feels it better not to publicize its location, we would be glad to talk to an archaeologist with BLM about the site we would like to see protected as an ACEC.

289-17

Have the trail and shrine sites in the Bouse area been evaluated for the National Register? We think they should also receive ACEC protection.

Is Table Top Mountain of religious significance to the Pima, Papago, or any other American Indian group? On pp. 296 and 331 of THE PIMA INDIANS by Frank Russell (U.S. Bureau of American Ethnology Annual Report 26, 1904-1905) there is a reference to a "Table mountain" (Matcipand unavangu/Matcipant). These groups should be contacted in order to determine if it is sacred. This would reinforce BLM's recommendation for wilderness status of the Table Top Mountains WSA as it would reduce human impacts on the area.

289-18

We would like to know how BLM proposes to avoid or mitigate direct impacts from grazing on cultural resources (EIS, p. 631). It appears to us that BLM's conclusion paragraph on p. 65 for the land tenure issue is too general. Disposal of land which would presumably be developed or used more intensively than under BLM control would undoubtedly have an impact on cultural resources and loss of cultural resources is not only possible but probable.

SOCIAL IMPACTS

The social impacts section of the EIS needs to be greatly augmented. The only social group mentioned in regard to impacts is ranchers (EIS, pp. 69, 72, 77, 82). The EIS should assess, for example, the social impacts of not designating wilderness or ACECs.

289-19

We question the validity of "informal interviews with residents in the CCDs" (EIS, p. 48). How are these residents chosen? The sample of persons chosen should be statistically defensible. Moreover, the questions asked should be the same for each person. BLM presents no evidence that the "informal interviews" sample has any statistical validity.

OTHER ALTERNATIVES

The Resource Production Alternative states that it would "contribute to the economy of the region" (EIS, p. x). So would the other alternatives. This general statement needs to be augmented. The consequences of the Resource Production Alternative on wilderness could be degradation of wilderness values in BLM's view. We feel that "could" should be changed to "would."

The Resource Production Alternative (EIS, p. 74) projects benefits from minerals and energy development. But how much would these benefits impact the economy of the study area?

Small ranchers sustain the greatest reductions (proportionally) under the Resource Production Alternative, and probably would be more greatly impacted. Why is this so?

289-16

Sites eligible to the National Register are protected from adverse impacts by ARPA, 36 CFR 800, NHPA of 1966 and NEPA of 1969 as described in Chapter 2. Designation of ACEC areas for significant cultural sites would have to be publicized, thereby bringing further attraction to the site and possibly increasing vandalism. However, we will look at designation of significant sites for special management areas in a case by case basis.

The petroglyph site (mentioned on page 44 of draft EIS) is currently being studied under a Cultural Resource Management Plan (CRMP) which will determine how the site will be managed and protected in the future. Within a CRMP, the BLM identifies protection, recordation, and other needs for long-term site management without publicizing precise site areas.

289-17

The trail and shrine sites in the Bouse area have not been evaluated for eligibility to the National Register yet, since they are being recorded by amateur archaeologists. Again, other types of protection, besides ACECs, are available as discussed in No. 1.

Table Top Mountain does not appear to be of religious significance to the Pima, Papago, or other Indian groups. Chapter 5 discusses various letters of notification, publication in the Federal Register, and public scoping meetings which invited comments and discussion from the public. In particular, 21 Indian tribes and councils were sent copies of the draft EIS for reviewing (page 92 of draft EIS). No responses were returned from any Indian group.

OTHER ISSUES AND COMMENTS

289-20

Are the springs mentioned on p. 41 designated Public Water Reserves? If they are not and can be so designated, they should be. Also, what is the trend in the groundwater table (EIS, p. 41)? The EIS should also explain that the toxic pollutants found in the Gila River include pesticides no longer authorized for use in the United States.

BLM's assumption #1 ("General Assumptions for Analysis," p. 53), that there will be sufficient funding and work force to achieve the goals of the selected alternative, is probably unwarranted. BLM must also consider indirect impacts resulting from implementation of the planning alternatives.

There should be an explicit monitoring element of the plan not only for grazing but for other resources as well, including wildlife and cultural resources. The plan should establish thresholds at which action will be taken to correct resource degradation. The best approach would be to monitor ecosystems, not certain species, yet taking into account BLM's responsibilities for threatened, endangered, and otherwise sensitive species.

We also believe that wildlife, including plants, is irretrievably and irreversibly committed to be lost if the Proposed Action is implemented because of impacts from grazing, mining, and ORVs (EIS, p. 87).

The paragraph on short-term uses vs. long-term productivity needs to be augmented.

We appreciate the opportunity to comment on this EIS and proposed plan. BLM has done much hard work in producing it and we hope our suggestions resulting from detailed consideration and analysis of the Draft EIS will be incorporated into the Final EIS and RMP.

Sincerely,



Cary W. Meister
President

289-18

During April 9 -12, public hearings in Phoenix and Gila Bend and public meetings in Ajo, and Quartzsite were held for discussion on the draft RMP. Again, no cultural concerns were voiced from representatives from American Indian tribes or councils. A review of Persistence and Power (Cultural Systems Research, Inc. 1978), a document discussing areas of concern for various Indian groups, did not reveal any information on Table Top Mountain.

As stated in Chapter 2, page 21 of draft EIS, proposals involving areas of ground disturbance are approved (including range improvements such as fence or well construction, cattle holding grounds, etc.) site specific cultural resource field evaluations will be completed. These include Class I literature review, as well as Class III field inventory in areas which have not been previously surveyed for archaeological remains. Impacts to significant cultural resources identified during these inventory stages would be avoided by redesigning the project in another location or by developing mitigating measures to reduce adverse impacts. The latter are discussed in 36 CFR 800.

The conclusion paragraph on page 65 for the land tenure issue should have included reference to Chapter 2, which makes it clear that prior to disposal of public lands, significant cultural sites are identified and mitigated, if necessary, to reduce adverse impacts. As stated in the draft RMP/EIS on page 21, a Class III inventory, which is an intensive on the ground search for cultural remains, and a Class I

literature search will be conducted prior to transfer of title of lands. In some cases, a Class II sample inventory is appropriate for land disposal. Impacts to cultural resources by land disposals are avoided or mitigated in the same manner as those by ground disturbances. However, BLM in consultation with the State Historic Preservation Office has developed a MOA which permits an adequate Class II cultural inventory on BLM lands proposed for exchange with the State instead of an intensive Class III inventory (MOA Regarding Cultural Resource Protection Responsibilities among BLM, Arizona State Land Department, Arizona State Historic Preservation Officer, and Arizona State Museum 1984).

289-19 The information on public attitudes and expectations is descriptive and general. It is illustrative and is not based on a scientifically valid sample.

289-20

Not all naturally occurring springs and water holes in the Lower Gila Resource Area are designated Public Water Reserves. However, like other ground water users, the Bureau can protect its interest in specific sources by filing for water rights with the Arizona Department of Water Resources.

In general, water levels are in decline in the major ground water basins within the RMP/EIS area. However, because local conditions vary, the Arizona DWR should be contacted for site specific data.

The Arizona Department of Health Services has detected the presence of DDT in the Gila River and Painted Rock Reservoir. This pesticide, which is no longer authorized for use in the United States, is not used on public lands in the RMP/EIS area.

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(602) 679-2255
23 Miles North of Flagstaff, Arizona 86001

May 5, 1985

Phoenix District BLM
4015 West Deer Valley Rd.
Phoenix, Az 85027

Re: Wilderness Study Areas
within the State of Arizona

Dear Sirs:

Several areas that I've been interested in in regards to Wilderness status I have learned are not being proposed for such status by the Bureau of Land Management. I have several times written to your agency requesting information about these locations as well as writing you several long letters as to the reason why I felt certain areas deserved attention.

Needless to say I have not recieved any replies nor information about public Hearings. Frankly, I'm not happy at the attitude on the part of the BLM in regards to such matters. Those who are a small loud mouth minority seem to capture your attention more. I refer to such groups as to off-road people who scatter beer cans all over our State. I'm also disgusted with the fact that BLM does not give adequate consideration to archeological areas, nor to the fact that many of the areas under their domain have religious significance to the various Tribes who once owned those areas and still consider them as important. Both these issues are covered by Federal Acts which seem to have very little bearing on BLM's consideration.

Specifically I'm referring to Baboquivari Peak, Pichacho, and Table Mountain as well as several others that I had written to you about a couple of years ago. I also wish to point out that the North Maricopa Mountains have very important cultural areas as well as desert wild life that needs protecting. But again you seem to be afraid of the "Survivalist Mentality" if it could be called a mentality.

Coyote Mountain should be protected regardless of the size of the parcel. Such reasoning about it being too small is totally indefensible. But we find that those who make such statements are impossible to find since they hide inside some office. I feel that the entire process has been one where the BLM has already made up their minds and are now just going through the motions of making it appear that they have really done all they can. But exactly for whom?

Wilderness Study Areas

Page 2

I find all the comments about copper possibilities interesting in light of the fact that this State has seen a record number of mine shut downs in the last four or five years, with the copper companies saying that they aren't sure when they'll ever open again because of the world price and glut of the copper market. Its very hard to make a case for any shortage of copper.

With the huge growth in the population of Arizona and the large number of people from California who come over to Arizona due to their crowded conditions, plus the fact that each year we see more and more winter visitors not only from the east but from Canada it appears that we really need to have as much open space as we can get- undisturbed by screaming vehicle engines of any kind.

The Arizona deserts are not all that vast when one looks at what is happening to the State. Also when one looks at the tremendous over-crowding that is happening to our National Parks and Monuments. This is going to get worse not better and it is time that the BLM, Forest Service as well as the National Park Service take a large over all view of what is happening.

So with this I hope I have made it clear that I feel that there has been too little concern for saving Arizona from the few who want to destroy our deserts and take to long time view and realize that once its destroyed that is it. So in the over-all it would be best to err on the part of being over-protective than to later say "it should have been done differently". As for the present exploitative point of view all I can say is that "this too will pass"!

Sincerely yours

William Beaver
William Beaver

Copies to Washington D.C.

292

WILLIAM A. DAVIS
1188 WEST GILACONDA WAY
TUCSON, ARIZONA 85704

May 6, 1985

Phoenix District Bureau of Land Management
2015 West Deer Valley Road
Phoenix, AZ 85027

Re: Wilderness Areas

Dear Sirs--

I understand that you have recently released recommendations for areas to be designated wilderness.

I hope you will include all the areas as wilderness. We have so little of it left; we should save as much as

possible of our American heritage.

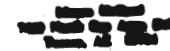
I am particularly interested in Baboquivari Peak, an area I know well. I hope you will include both the present B L M land and contiguous state land in wilderness.

Very truly

William A. Davis
William A. Davis

CC: Senator Dennis DeConcini
Congressman Jim Kolbe

293



Tucson, Arizona
May 5, 1985

BUREAU OF LAND MANAGEMENT
Phoenix District
2015 W.. Deer Valley Rd.
Phoenix, AZ 85027

Dear Sirs:

I am distressed to learn that recommendations for wilderness protection in Arizona made by the Bureau of Land Management completely eliminate many of the areas I consider crucial. Since your agency has requested public comment, I will state my views.

The Little Horn Mountains (two sections) provide important habitat for bighorn sheep and the desert tortoise. Unless designed as wilderness, these areas may be threatened by mining, oil and gas exploration, and other types of intrusion. Since they are adjacent to the Eagletail Mountains which are being proposed for wilderness, it seems important to provide the same protection for the approximately 100,000 acres of the Little Horns.

Why are the Coyote Mountains not being recommended for wilderness status? Though small in area, they nevertheless contain "special status" wildlife and plant species, as well as important former Hohokam Indian dwelling sites.

The Baboquivari Peak area, nearer Tucson, certainly deserves the utmost in protection and I sincerely hope that the BLM will proceed with its plans to acquire 3,000 additional acres of state land in order to enlarge the size of the area being given wilderness designation.

Other areas which I feel deserve wilderness protection include the Signal Mountains (desert tortoise and bighorn sheep), North Maricopa Mountains (also tortoise and bighorn sheep habitat), White Canyon, Mt. Wilson (more bighorn sheep), - to list several of those which have been undergoing study.

Please re-study these and other areas.. I feel it is urgent that more of Arizona's "wilderness" areas be so designated so that they can be preserved, too. Thank you.

Sincerely,

Linnea Holland
Linnea Holland (Mrs. S.T.)
7460 N. San Anna Dr.
Tucson, AZ 85704

cc: Senator Goldwater
Senator DeConcini
Congressman Udall

COMMENTS AND RESPONSES

295

MAY 8, 1985

DEAR SIRs:

I THOUGHT THE RESPONSIBILITY OF THE B.L.M. WAS TO EFFICIENTLY MANAGE THE PUBLIC DOMAIN. BECAUSE THIS NATION CURRENTLY IMPORTS THE VAST MAJORITY OF ITS BASE AND STRATEGIC METALS FROM OVERSEAS SOURCES DOESN'T MEAN THAT THESE SOURCES WILL ALWAYS BE HANDY AND ECONOMICALLY EXPEDIENT. HOW DO ADMINISTRATORS WITH NO EXPERTISE IN MATTERS CONCERNING MINERAL TECHNOLOGY PRESUME TO KNOW WHAT NEW INDUSTRIAL APPLICATIONS UTILIZING ANONYMOUS, UNDISCOVERED MINERALS MIGHT BE IMMINENT. BY THE INDISCRIMINATE CLOSING OF ENTIRE MOUNTAIN RANGES TO MINERAL EXPLORATION, YOU COULD BE POSING SERIOUS THREATS TO THIS COUNTRY'S INDEPENDENCE AND NATIONAL SECURITY. TODAY'S GOVERNMENTAL POLICY REGARDING FEDERALLY ADMINISTERED PUBLIC LANDS SEEMS TO BE DETERMINED BY THE ONE-DIMENSIONAL IDEALS OF THE ENVIRONMENTAL LOBBYISTS. FURTHERMORE, THE ECONOMIC PLIGHT WITHIN THE MINING INDUSTRY HAS ONLY BEEN INTENSIFIED BY RECENT EXTENSIVE FEDERAL LAND RECLASSIFICATIONS. CONTINUED CLOSURE OF LANDS TO MINERAL DEVELOPMENT CAN ONLY POUND NAILS IN THE COFFIN OF AMERICAN MINES. FOLLOW THE PIPE DREAM OF ENVIRONMENTAL IDEALISTS; ELIMINATE POTENTIALLY VALUABLE LAND TO PROSPECTING; FORGET ABOUT THE LEGACY AND ACCOMPLISHMENTS OF THE AMERICAN MINING MAN; IT'S HIGHLY LIKELY THAT OUR CHILDREN WILL FORGET ABOUT FREEDOM AND INDIVIDUALITY.

OPPOSED TO W.S.A.

G. R. Ralph

94 S 3rd Ave.

Yuma, Az 85364

RECEIVED

298

May 7, 1985

Mark Sterkel
Navajo National Monument
HC63, Box 3
Tonalea AZ 86044-9704

Staff: Bureau of Land Management
Phoenix area District
2015 W. Deer Valley Rd.
Phoenix, AZ 85027

Dear BLM Staff;

I have had the opportunity to review the Agency recommendations for wilderness designation, and have a few comments and suggestions for consideration and the record. I myself deal with public resources, though in a different manner than your agency. Seeing the US and the rest of the industrialized world devour wild pristine lands at senseless rates, I feel that wilderness is a most definite need for our society. I ask you, what is the harm in designating large biologically complete units of wild land as wilderness? Spoiled wilderness can never really be returned to its pristine state, but conversely, wild pristine lands designated wilderness stay wild and pristine, and can always have the potential of being developed, though I would hope it would never happen.

There are too many "no wilderness" recommendations in your plan. WHY?? Considering the potential to later use the resources, and the large BLM holdings, I feel as much acreage as possible should be recommended as wilderness, and that your agency should give whole-hearted support to the recommendation process.

The following WSA's should be designated and recommended in their entirety, with the addition of as much additional acreage as possible.

- White Canyon
- Mt. Wilson
- Coyote Mountains
- Baboquivari Peak **
- Hell's Canyon
- Picoacho Mountains

** Baboquivari Peak area is quite unique, and a treasure to all Americans, since all Americans own BLM land, not just the subsidized ranchers. This wilderness should include the roughly 3000 acres of nearby state land that you can trade for. (are cattle really that important that we will overgraze and waste the last vestiges of untrampled sonoran wildlands??)

Every single area in the Gila South EIS should be recommended for wilderness, but with the inclusion of additional acreage to make the WSA's complete biological units, even if it means closing some minor dirt tracks or limiting some permittee's damaging herds.

Please consider the above facts, and try to recommend as much wilderness as you can. What do we have to loose??

Sincerely,

Mark Sterkel

Mark Sterkel

300

TUCSON AZ
5-8-85

639 Fremont Circle
Green Valley, Az. 85614
May 8, 1985

PHOENIX DIST BLM

I WOULD LIKE TO VOICE MY
OPPOSITION TO WILDERNESS
RECOMMENDATIONS FOR ALL DISTRICTS
IN YOUR AREA. THERE IS NOT
ANYTHING TO BE GAINED BY SUCH
FOOLISH AS THIS.

Phoenix District BLM
2015 W. Deer Valley Rd.
Phoenix, Az. 85027

Gentlemen:

As members of the National Audubon Society and other nature groups, we would like to add our voice in support of recommendations of wilderness designations in Arizona. In fact, perhaps they do not go far enough.

As our most immediate concern (geographically) we particularly are interested in the Baboquivari Peak wilderness, and agree that it should also include 3,245 acres of contiguous state land that should be acquired by trade.

Yours truly,

Wm. Leland Mason

Mr. and Mrs. W. T. Mason

THANK YOU
J. M. MYERS SP. 26
1295 W. MIRACLE MILE
TULSON ARIZONA 85705

J. M. Myers

MAY 10 1982
 БНОВИХ АВІОНА
 ВІВ БНОВИХ ДІВ ОВ
 КЕСЕЛД

COMMENTS AND RESPONSES

RMP COMMENTS FOR LOWER GILA SOUTH

No Wilderness Comments:

There were 135 comments received that voiced similar concerns about the proposed plans described and analyzed in the draft Lower Gila South RMP/EIS. These comments were requesting the Bureau of Land Management not to designate any of the wilderness study areas wilderness for several reasons. These reasons were:

1. Closure to vehicular use.
2. Closure would not allow the older citizens to utilize the areas for scenic rides, rock and gem hunting, wildlife viewing and other related activities.
3. Many of the winter visitors to the area aren't able to hike or enter the areas without motorized transportation because of handicaps or other health reasons.
4. Wilderness is just another "bureaucratic land grab".
5. Designating the area's wilderness would close them to future mineral exploration and development.
6. Closing the areas to motorized vehicular use would have an adverse economic impact on the surrounding communities.
7. The areas do not meet the wilderness criteria.

The following persons submitted comments voicing all or some of the above listed reasons for not designating the areas wilderness:

- | | |
|---|---------------------------------|
| 10. Mr. and Mrs. Robert Allison | 148. C.O. Hartman |
| 11. David P. Trenholm | 149. Bill Christman |
| 12. A.S. Harman | 150. Donald E. McKay |
| 13. Mr. and Mrs. Robert Kloster | 151. James F. George |
| 14. Mr. and Mrs. Don McMurry | 152. David Taylor |
| 15. David Taylor | 153. Joe Siznor |
| 16. Lila and Martin Jorde | 154. Kenneth R. King |
| 18. Mr. and Mrs. H.F. Waggoner | 155. John Heflin |
| 19. Mr. and Mrs. Richard C. Bias | 156. G. Simard |
| 20. Rodney and Audrey Isaacson | 157. Dan Todd |
| 22. Mr. and Mrs. W.H. Douglas | 158. Samuel Heflin |
| 64. John and Bernice Soltis | 159. Chester F. Hunt |
| (50 others signed) | 160. J.O. Buffaler |
| 70. Deloris Millard | 161. Dorothy Christie |
| 71. Morris L. Millard | 162. John and Marilyn McFate |
| 94. Claud Johnson | 163. Earl K. Johnson |
| 95. Ellis Merritt | 164. Raive Munts |
| 96. Alyce L. Cogle | 165. Karl Luthin |
| 97. G.D. Eaton | 166. Hazel Vincent |
| 99. Norma Campbell | 167. Nathan F. Johnson |
| 110. Paul Fisher | 168. Bob Todd |
| 111. Koss Kirkpatrick | 169. Dave Johnson |
| 113. Homer R. Owens | 170. Kendriek Holder |
| 114. Ora J. and Eugene J. Shumaker | 171. Clinton F. Huntoon |
| 117. John R. Wilson | 172. Gene Mrotek |
| 118. Ellis Merritt | 173. Orrill May Stedman |
| 119. Helen Merritt | 174. Elizabeth Palmer |
| 120. W.C. Saladiv | 175. R.R. Palmer |
| 121. T.E. Porowski | 176. Dale Johnson |
| 122. Lloyd T. Pruitt | 177. Fred Williams |
| 123. Mr. & Mrs. Lawrence L. Burton, Sr. | 178. Gene A. Verely |
| 125. Arthur J. Heilkisar | 179. No Signature |
| 126. Walter and Alice Pappin | 180. Louis C. McHenry |
| 127. R.D. (Bob) Cooper | 181. Maggie Mince, John Whitson |
| 128. W.M. Davis | Amelia Whitson |
| 129. Ruth M. Thompson | 182. P.L. Baumann |
| 130. J.P. Herz | 183. Douglas Hunt |
| 146. Clarence Gracely | 184. Pete Peterson |
| 147. Margaret Gracely | 185. Emile Claud |

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|----------------------------|---------------------------|
| 186. William Burney | 225. Bailey Escopule |
| 187. Cary Cousin | 226. Jessie Purtee |
| 188. James L. Smith | 227. Laura Ann Woodard |
| 189. Marlene Wilson | 228. Steve Henderson |
| 190. Ted Schroeder | 229. Owen Ladhery |
| 191. Paul E. Neff | 230. Paul Cohn |
| 192. C.R. Hafford | 231. Wanda Houghtelin |
| 193. Robert D. Hamilton | 232. Les Bunde |
| 194. Ralph F. Griffin, Jr. | 233. Dean Houghtelin |
| 195. James Herring | 234. George Corlery |
| 196. Gary Howard | 235. Maynard Capewell |
| 197. K.O. Sherwood | 236. Harry Williamson |
| 198. L.C. Miller | 237. M.G. Bush |
| 199. Randi Shumway | 238. Thomas J. Forqueron |
| 200. Susan Thompson | 239. Ruth White |
| 201. John Merly | 240. Dottie M. Williamson |
| 202. Michael Thompson | 241. Glenna C. Auld |
| 203. Robert R. Aken | 242. Hondo Dunn |
| 204. James Collins | 243. James Rice |
| 205. Edward Collins | 244. James A. Goble |
| 206. D. Tivitchell | |
| 207. William E. Bohme | |
| 208. P.W. Thompson | |
| 209. Eula Belle Bohme | |
| 210. Delores K. Aker | |
| 211. Delores Harrington | |
| 212. Charles Schwab | |
| 213. Joyce Wright | |
| 214. Ernie Fetzer | |
| 215. John Blankenship | |
| 216. Daryl V. Link | |
| 217. P. Strough, Jr. | |
| 218. Opal Illingworth | |
| 219. William Illingworth | |
| 220. Arthur J. Gross | |
| 221. Vijare Winkers | |
| 222. Leslie E. Kumles | |
| 223. Wayne Winters | |
| 224. Arley Escopule | |

ALL WILDERNESS

There were 65 comments received that requested that the Bureau recommend all 12 WSAs studied in the draft EIS for wilderness designation. Many of the comments stated that the increased population of the southwest, (principally the Tucson and Phoenix areas) as the need to have these areas designated wilderness to protect the areas from development and mining disturbance. Also, there is a need to have large open areas free of roads and evidence of man for the people to go to for peace of mind and away from the rush and noise of the large metropolitan areas.

The following persons submitted comments voicing all or some of the above reasons for recommending wilderness designation for all 12 WSAs:

- | | |
|-------------------------------|--|
| 23. Leroy Zimmerman | 101. Coco Savage |
| 25. M.K. Daly | 103. Molly Coffin and Tris Coffin |
| 26. Rosemary Spaulding | 104. Marie A. Burling |
| 27. Mr. and Mrs. J.E. Lilly | 107. Robert A. Kerry |
| 34. Scott Hudson | 109. Linda Schnabel Stitzer |
| 36. Nancy L. Russell | 112. Wallace J. Gibbs |
| 42. Majorie Woodruff | 141. Wolf and Dorothy Pelech |
| 44. J. Salty Honeharik | 144. Valerie Payson |
| 46. Nancy Tukey | 249. Geoffry Platts |
| 48. John S. Jachus | 254. Edward H. Murphy |
| 49. Peggy Ann Doty | 261. Joan Ridder |
| 52. Greg Barr | 265. P.A. Nisbet |
| 53. John Pamperin | 272. Mary C. Newtin |
| 55. Donovan H. Lyngholm | 274. Donald A. Brown |
| 60. Mary Sojourner | 275. Mrs. Sherry Gillingham |
| 62. Dara Newman-Samuels | 277. Mrs. Thomas Spencer |
| 63. D. Scott Samuels | 280. Richard A. Coxhead |
| 65. Maureen Mageau-DeCindis | 283. L.E. Spesard |
| 66. Victoria M. Scheffer | 286. Robert W. Grange |
| 67. Neil S. Klemek | 287. Helene Unland-Rinjel |
| 68. Sue Baughlman | 288. Jule Drown |
| 69. Mrs. George Veassis | 290. Maurice M. Feters |
| 72. Rebecca P. Allison | 294. Mr. and Mrs. S. Alberto Castaneda |
| 73. Marcia and George Colliat | 296. Edward P. Klohe |
| 75. Sandie and Fred Nelson | 297. Janet K. Morrison |
| 76. Ann S. Johnson | 301. Mr. and Mrs. James Fitzsimmons |
| 77. Lilliam A. Santomaria | |
| 78. Kevin J. Fernlund | |
| 79. Henry and Joy Schultz and | |
| 80. Rhoela V. Varn | |
| 81. Nancy Stevenson | |
| 82. J. Lorenzini | |
| 83. Elizabeth Pomich | |
| 86. Larry Langstaff | |
| 89. John Barcellos | |
| 90. Holly Carman | |
| 100. John E. Earl | |